

SEVENOAKS DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK ADVISORY GROUP

07 September 2011 at 5.30 pm in the Conference Room - Council Office

AGENDA

Chairman: Cllr Mrs J Davison

Cllr. I Bosley, Cllr Mrs A Cook, Cllr. R J Davison, Cllr. Mrs A Dawson, Cllr. M Fittock
and Cllr. R Walshe

Other Members: Cllr. Parry, Mr. Czamowski and Mr. Coupland
and a Management Team representative.

1. **Welcome**
2. **Apologies for Absence**
3. **Minutes of the meeting of the Group 6 April 2011** (Pages 1 - 6)
4. **Declarations of Interest**
5. **Matters Arising including actions from last meeting (attached)** (Pages 7 - 8)
6. **Development Management Policies: Response to the Consultation** (Pages 9 - 80)
Hannah Gooden
7. **Open Space Site Allocations** (Pages 81 - 160)
Hannah Gooden
8. **Affordable Housing Supplementary Planning Document** (Pages 161 - 180)
Alan Dyer
9. **National Planning Policy Framework** (Pages 181 - 202)
Alan Dyer
10. **Any other business**
11. **Date of next meeting 7 December 2011**

Membership of the Advisory Group

- The appropriate Portfolio Holders – *Cllr. Mrs. Davison*
- Chairman of Development Control Committee – *Cllr. Mrs. Dawson*
- The Chairman and Vice-Chairman of the Performance and Governance Committee and Chairmen the Environment, Social Affairs and Services Select Committees – *Cllrs. Bosley, Mrs. Cook, Davison, Fittock and Walshe.*
- A Management Team representative (can change as and when appropriate depending on the subject under consideration by the Group)
- One town and parish council representative (to be nominated by the local area committee of the Kent Association of Parish Council (KAPC) with a preference for the Chairman of the KAPC (Sevenoaks Branch) or his representative)
- At least two representatives from Local Strategic Partnership (In the case of District Council, which shares a joint LSP with Tunbridge Wells and Tonbridge & Malling, these representatives would be drawn from the Sevenoaks District Community Partnership) – representatives can change as and when appropriate depending on the subject under consideration by the Group;
- That the Chairman of the Group, in consultation with the Community and Planning Services Director, be authorised to invite relevant Officers and representatives from the Sevenoaks District Community Partnership as and when appropriate.

LOCAL DEVELOPMENT FRAMEWORK ADVISORY GROUP

**Notes of a meeting of the Local Development Framework Advisory Group
held on 6 April 2011 commencing at 5:30 p.m.**

Present: Cllr. Mrs. Davison (Chairman)
Cllrs. Bruce, Mrs. Cook and Williamson.
Cllr. Davison was also present.
Cllr. Parry (KAPC Representative)
Mr Frank Czamowski (Chief Executive of West Kent Housing)
Mr. Steve Craddock (Senior Planning Officer), Mr. Alan Dyer (Planning Policy Manager) and Mr. David Lagzdins (Democratic Services Officer).

25. **WELCOME** (Item No. 1)

The Chairman welcomed everyone to the meeting.

26. **APOLOGIES FOR ABSENCE** (Item No. 2)

Apologies had been received from Cllrs. Bosley and Walshe.

27. **MINUTES OF THE MEETING OF THE GROUP – 16 FEBRUARY 2011** (Item No. 3)

A Member asked whether Officers had more information about the costs of Neighbourhood Plans. The Planning Policy Manager said he did not but one new suggestion was that businesses may be allowed to produce Neighbourhood Plans. A Member informed the Group that the Electoral and Land Charges Manager had reported the cost of district-wide referenda as £50,000 each.

Resolved: That the minutes of the Group (23.08.10) be approved as a correct record.

28. **DECLARATIONS OF INTEREST** (Item No. 4)

None

29. **UPDATE TO THE LOCAL DEVELOPMENT SCHEME** (Report No. 5)

The Planning Policy Manager reminded Members that the Council must still produce the Local Development Scheme and submit it to the Secretary of State for approval. It had not been updated since 2008, though a draft was produced and taken to the LDF Advisory Group in 2010. He thought it was the appropriate time to update the Local Development Scheme because the Core Strategy had been agreed.

The Allocations and Development Management documents had been combined to save expense on examinations and on publication. It was important the Community

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Infrastructure Levy (CIL) Charging Schedule was approved before April 2014 when restrictions were to be put on the use of pooled contributions from s.106 agreements.

A Member questioned whether pre-control risk likelihood for the Council having insufficient financial resources to complete the Local Development Framework (LDF) should be so high. The Planning Policy Manager believed the LDF involved considerable expense but the Council had put in many controls such as a specific budget and the efforts at making savings. The Member clarified that the Council would still have the resources, even if it had not been budgeted sufficiently.

Asked whether Parish Councils had shown much interest in Parish Plans and Village Design Statements, the Planning Policy Manager stated that he had given a presentation to them soon after the Core Strategy was presented. Their focus was updating existing documents rather than creating new ones. It did not matter who drew up the Plans and Statements but he recommended that the District Council not approve such documents without a Parish Council's approval. He asked that Parishes involve the District Council in the drafting process so that the chance of conflicting policies was reduced.

Resolved: That the Local Development Framework Advisory Group support the proposed revisions to the Local Development Scheme.

30. ALLOCATIONS AND DEVELOPMENT MANAGEMENT DEVELOPMENT PLANNING DOCUMENT (Item No. 6)

The Planning Policy Manager clarified that the Item permitted the Council to begin consultation on the Development Management matters raised in the document. The Development Management document aimed to manage and control new development in line with the Core Strategy, replacing the remaining policies of the Saved Local Plan. Consultation for Allocations had already taken place. The Allocations and Development Management elements would be combined into a single Development Plan Document (DPD) once the consultation was over. He expected the DPD to be ready by the end of the year.

The Group went through the document and Members raised questions about particular matters. Members were also handed a Schedule of Amendments made since the Agenda was published.

Policy SC1 – Sustainable Development

A Member questioned whether it was the right place to refer to “contribution to the District's economy”. It was so important it could have its own policy. The Planning Policy Manager believed it an important part of sustainable development but he was open to restructuring the document. He added that this would not compromise the Green Belt Policies which remained.

Members were also concerned that references to Village Design Statements were only in the text and not the policy itself. They thought it should be added to the reference to compatibility with the location, as well as the references already made to it in the Core Strategy. The Planning Policy Manager agreed to consider amending the wording.

Policy ECC1 – Outdoor Lighting

A Member asked what affect this would have on villages' considerations on the use of outdoor street lighting. The Planning Policy Manager clarified that the principle of having it or not should be kept outside the document.

Policy HA2 – Heritage Assets

The Planning Policy Manager denied that this would make it prohibitive to save older buildings with modern techniques so long as a need is demonstrated. He did not want to make the option of demolishing the buildings too easy.

4. The Green Belt

The Chairman brought the Group's attention to the note about Minor Green Belt Boundary Amendments. She felt it important that PPG2 stated Green Belt boundaries should not alter just because land becomes derelict.

Members were told that the limits on rebuilding did not affect Major Developed Sites.

Policy H2 – Limited Extensions or Outbuildings to Existing Dwellings in the Green Belt

The Planning Policy Manager believed the change in limits for extensions, from 50% of floor-space to 30% of volume was slightly more strict. A Member, not on the Group but who sits on the Development Control Committee, believed this was a good idea. For example, applications were often unclear about whether roof-space would be used.

Officers were asked whether a different rule could apply to smaller properties, because they have a smaller impact on the environment. They accepted this could be added to the consultation but parties would have to consider what would be considered "small".

Policy T2 – Vehicle Parking

Members were concerned at the reliance on the Kent County Council (KCC) interim vehicle parking standards. The Planning Policy Manager informed them that any amendment would be unsustainable without Sevenoaks District Council researching its own standards, at a considerable effort.

Members believed the statement that over provision of parking would encourage an unsustainable car dominated culture was inaccurate. The Planning Policy Manager agreed to remove this clause.

Action: The Planning Policy Manager to remove the relevant clause from the document.

They were also concerned that the presence of public transport should not be reflected in lower parking provision. Not all journeys could be covered by public transport. The Planning Policy Manager emphasised that the policy did not set parking at nil where public transport existed. Members expressed support for

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qualifying that this was only where developers could demonstrate no adverse impact from on-street parking, or that there may be “some relaxation” in parking provision in such cases.

The Planning Policy Manager accepted Members’ requests to write, with their support, to KCC for reform of parking standards.

Action: The Planning Policy Manager to write to KCC to request amendments to parking standards to prevent problems with on-street parking.

Policy LC1 – Sevenoaks Town Centre

A Member stated that local people felt it important that numbers were added to shops in Sevenoaks. Officers were unaware of any planning requirement which could make this compulsory.

Policy LT1 – Hotels and Tourist Accommodation

A Member asked whether developers could exploit the argument of diversification of the rural economy, in Core Strategy Policy LO8, to build in the Green Belt. He was reminded that LO8 stated that such development must be consistent with Green Belt and other policies.

In response to a question the Senior Planning Officer said large supermarkets did not meet the definition of a local shopping centre. However, it was proposed to ask for additional areas to be considered through the consultation.

Resolved: That:

- a) the Allocations and Development Management DPD Draft Policies for Consultation be agreed and published for consultation;
- b) the Portfolio Holder be authorised to agree minor presentational changes and detailed amendments prior to publication to assist the clarity of the document; and
- c) copies be made available for sale at a price to be agreed by the Portfolio Holder.

31. AFFORDABLE HOUSING AND DEVELOPER CONTRIBUTIONS SUPPLEMENTARY PLANNING DOCUMENT (Item No.7)

The Senior Planning Officer briefed Members with an outline of the document. A schedule of amendments was tabled. It was also clarified that the consultation process would be the same as for the DPD.

It was asked whether there was any protection from variations in land value when making calculations of off-site financial contributions for affordable housing. There was concern that developers exploit low property values to reduce any contributions

to pay. The Planning Policy Manager asked for suggestions but did not want to make the calculations any more complicated.

The Senior Planning Officer drew Members' attention to the Open Space and Swanley Community Fund aims, which he believed were the most significant proposals. Members attention was drawn to a proposed amendment that would allow the Council to develop the Community Fund scheme to other areas where there is an evidence-based need. They were also reminded that the Council faced difficulties requesting contributions for infrastructure not listed unless there was a sound justification for them. Otherwise the Council would be susceptible to be challenged at Planning Appeals. Officers clarified that the list of services considered by the SPD was drawn up after consultation with local service providers and interested parties, through the preparation of the Core Strategy.

Resolved: That:

- a) the drafts for consultation of the Affordable Housing and Developer Contributions SPDs be agreed and published for consultation for 8 weeks in May 2011;
- b) the Portfolio Holder be authorised to agree minor presentational changes and detailed amendments prior to publication to assist the clarity of the documents; and
- c) copies be made available for sale at a price to be agreed by the Portfolio Holder.

32. ANY OTHER BUSINESS (Item No. 8)

None

33. DATE OF THE NEXT MEETING – 8 JUNE 2011 (Item No. 9)

The Planning Policy Manager informed the Group that, were Cabinet to approve the documents, he had no reports to take to a meeting on 8 June 2011 because it was the middle of the consultation period. The Group agreed that the next meeting should be in September 2011.

The Chairman thanked the Group for the individual expertise each of them brought over the years. She believed it had been a useful forum for debate and they had worked well together. The Group thanked her for her very effective Chairmanship.

THE MEETING WAS CONCLUDED AT 7:40 P.M.

Chairman

ACTION SHEET - Actions from the previous meeting

ACTIONS FROM 06.04.11			
Action	Description	Status and last updated	Contact Officer
ACTION 1	The Planning Policy Manager to remove from the Allocations and Development Management Development Planning Document the statement that over provision of parking would encourage an unsustainable car dominated culture was inaccurate.	This has been done.	Alan Dyer Ext. 7440
ACTION 2	The Planning Policy Manager to write to KCC to request amendments to parking standards to prevent problems with on-street parking.	<p>KCC considers that residential parking standards in “Interim Guidance Note 3” are underpinned by a substantial and growing evidence base. The approach taken in this document is considered to be consistent with emerging national policy. It could be used by Districts to develop their own standards but at present it appears that KCC has no intention to review its county-wide document.</p> <p>The new National Planning Policy Framework is likely to require a review of non-residential parking standards. A decision needs to be taken across the</p>	Alan Dyer Ext. 7440

		<p>County as to whether there should be a county-wide review, undertaken by KCC, or whether districts should develop their own standards.</p> <p>Officers from Kent County Council have expressed a willingness to meet with SDC Officers and Members to discuss parking issues.</p>	
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LDF ADVISORY GROUP – 7 SEPTEMBER 2011

LDF ALLOCATIONS AND DEVELOPMENT MANAGEMENT DPD - DRAFT POLICIES CONSULTATION

Report of the: Director of Community and Planning Services

Status: For Consideration

Key Decision: No

Executive Summary: Following adoption of the Core Strategy the second development plan document to be prepared as part of the LDF is the Allocations and Development Management DPD. This document will identify sites to achieve the aims of the Core Strategy and contain a series of generic policies against which planning applications will be determined. These policies will replace the remaining “saved” Local Plan policies.

Consultation has taken place on the draft policies and this document summarises the key representations received.

This report supports all the Key Aims of the Community Plan

Portfolio Holder Cllr. Mrs Davison

Head of Service Head of Development Services – Mr. Jim Kehoe

Recommendation: It be RESOLVED that the Allocations and Development Management DPD Draft Policies consultation response be noted and work commenced on a publication draft of the document.

Reason for recommendation:

To progress the Council’s Local Development Framework

Background

- 1 On 6 April 2011, the Council approved the Development Management draft policies for consultation. This document outlines the draft development management detailed policies that will be used to determine planning applications.
- 2 The Development Management draft policies were published for consultation from 26 May 2011 to 4 August 2011.

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Representations on the Development Management draft policies

- 3 Representations were received from a total of 83 organisations and individuals, listed in Appendix A. A summary of the main issues raised by respondents is contained in Appendix B.
- 4 The summary is structured by the order of the policies as set out in the consultation document.

Next Steps

- 5 The next stage in the process towards adoption is for the comments received as part of this consultation to be considered by SDC. There have been a number of comments received on the policies that cover extensions to residential properties in the Green Belt (Policies H2 and H3). A meeting to discuss the issues raised has been arranged with Councillors on 21 September.
- 6 The Development Management policies will then be combined with the Site Allocation document, which was subject to Options consultation in spring 2010. It is the intention to publish a final version of the Allocations and Development Management Development Plan Document (ADM DPD) in spring 2012, for pre-submission consultation and independent examination
- 7 Information on this timetable for further consultation and examination will be posted on the Council's website and Members will be informed of key dates.

Summary of key issues raised by consultees on draft policies

Development Management Draft Policies General Comments

- 8 General support. Reference to update and inclusion of principles set out in the National Planning Policy Framework (NPPF), highlighting presumption in favour of sustainable development and positive planning. Suggestion of further policy requirements in relation to specific issues – water infrastructure, energy infrastructure, air quality and AONB.

Policy SC1 Sustainable Development

- 9 Qualified support - suggested amendments relating to giving further prominence to the green belt, AONB and biodiversity issues. Suggestion to reference 'Secured by Design' principles and provision of supporting infrastructure. Clarity required in relation to the reference to 'balanced community'.

Policy SC2 Design Principles

- 10 Suggestions for additional design principles relating to parking criteria, walking and cycling routes, impact on local infrastructure, protection of green infrastructure. Concern that referencing security measures could lead to gated communities which are not supported. Support highlighted for good design and schemes that respect local character.

Policy SC3 Amenity Protection

- 11 Minor text changes suggested, including rewording the policy in a more positive context and providing further clarity in relation to resisting uses 'sensitive to poor environmental quality'. Suggestion that amenity of future occupiers should also be referenced in the policy.

Policy SC4 Reuse of Redundant School Buildings

- 12 General support. Suggestion to incorporate reference to viability into the policy. Recommendation to allow re-use for sports and recreation use or to provide accommodation for older people.

Policy SC5 Loss of Neighbourhood Services and Facilities

- 13 Strong support. Suggestion to apply policy equally to rural settlements, more clearly define 'neighbourhood services', and reference the Community Right to Build. Information from NHS Kent & Medway in relation to GP facilities in Hextable, Swanley and Sevenoaks, and need for allocation of a new site in Hextable.

Policy ECC1 Outdoor Lighting

- 14 Suggested amendments in relation to referencing impact of light-spill on adjoining premises / night sky / on AONB. Recommendation that additional policy should also cover water pollution and flooding and that there should be reference to Air Quality Management Areas (AQMAs).

Policy EEC2 Noise Pollution

- 15 General support. Suggestion that the word 'high' should be removed from the final paragraph i.e. proposals for high noise generating uses in the AONB will not be permitted...

Policy HA1 Heritage Assets

- 16 General support. Several recommendations that a Local List (of locally important buildings) should be compiled, although one objection to this proposal. Recommendation that ancient woodland should be protected and that definition of heritage assets should include artefacts discovered below ground.

Policy HA2 Demolition within Conservation Areas

- 17 Qualified support. Suggestion that demolition of buildings in Conservation Areas should be prevented until redevelopment is commenced. Comments regarding control of signage/advertising in Conservation Areas.

Policy GB1 Reuse of Buildings within the Green Belt

- 18 Mixed response. Some objection to 75% of the existing structure being maintained as this is considered to limit flexibility / the building may be unsafe /

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may encourage retention of unsightly buildings. Suggestion to re-use buildings for leisure (tourism/holiday accommodation/equestrian facilities) and community uses before residential. Traffic impacts of re-use needs to be considered. Reference to inclusion of details within existing policy GB3B which refers to re-use of buildings constructed in the last 10 years, demonstrating genuine agricultural need (to avoid speculative building for non-viable uses).

Minor Green Belt Boundary Amendments

19 Numerous suggestions for Green Belt amendments (see summary chart P.20).

Major Developed Site (MDS) Boundaries

20 Proposed amendment to existing MDS boundary at Fort Halstead.

Promoting Land for Housing

21 Several sites promoted for housing, which have been previously highlighted through the Core Strategy / Site allocations options consultations (see summary chart P.24).

Policy H1 Residential Conversions

22 Strong support. Comments related to impact on parking and traffic congestion from conversion of residential properties into apartments.

Policy H2 Limited Extensions or Outbuildings to Existing Dwellings in the Green Belt

23 Mixed response. This draft policy generated greatest level of comment, the majority of which raised concerns about the proposed policy. The main areas of objection were:

- each development should be treated on its individual merits;
- concern that by introducing a limit, people build to that limit, and hard to refuse anything below that limit;
- basements below ground should not be included as have no impact on openness of greenbelt;
- floor area preferred to volume for calculation as volume can distort design e.g. by encouraging flat roofs;
- need to introduce height restriction. Concern that current policy will lead to 'extensions upwards';
- volume more complicated to calculate/assess than floor area;
- object to the reduction in percentage size (50% to 30%). Considered 'too drastic';

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- policy will offer less than can be built under Permitted Development rights (which do not distinguish Green Belt areas). GPDO moved away from volume limits to specific criteria;
- base date should be more recent e.g. 2000 (not 1948); and
- confusing, keep existing policy.

24 Other areas of comment were:

- mixed reaction to suggestion of proportionately larger extensions for smaller buildings. Some objection as need to maintain housing mix, although some support as appropriate for smaller properties;
- non habitable floorspace (e.g. roof space) should be excluded;
- potential to remove permitted development rights;
- suggest the existing Local Plan policy H14B(2) which limits the size of outbuilding to 40 sqm should be maintained; and
- proposed policy will better capture the impact of extensions in the Green Belt.

Policy H3 Replacement Dwellings in the Green Belt

25 Similar comments as for Policy H2 above.

26 Concern that proposed changes may impact on the design quality of replacement dwellings and that there should be greater flexibility. Suggestion of using gross internal floor area instead. Reference suggested to circumstances where dwellings have been extended in excess of new policy and therefore like-for-like replacement should be allowed. Reference to AONB.

Policy H4 Re – Use and Protection of Existing Housing Stock

27 Strong support. Suggestion of additional wording that allows for redevelopment that leads to a net increase in units, provided it meets with other policy objectives.

Policy H5 New Residential Care Homes

28 Suggestion to word the policy more positively due to the increasing aging population in the District. Comments on good public transport access and facilities, amenity space and restrictions related to change of use.

Policy H6 Siting of Caravan and Mobile Homes

29 Suggestion that the policy should be limited to temporary permission only and concern that that it is not sufficiently strongly worded to control permanent mobile home development. Recommendation to add a time limit or reference to seasonal agricultural use.

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Promoting Land for Gypsy and Traveller and Travelling Show People Accommodation

- 30 General support for the approach and support for cross-borough working, provided it does not delay progress. Recommendation that planning policy for gypsy and traveller sites should be the same as for housing sites for the settled community. Support that sites in the Green Belt are considered inappropriate development.

Policy T1 Mitigating Travel Impact

- 31 General support. Suggestion to strengthen policy that permission will be refused if transport impact mitigation not provided/achievable. Policy should further promote walking and cycling, including reference to health impacts. Other issues raised included air quality, traffic impact on narrow lanes and commercial traffic movement.

Policy T2 Vehicle Parking

- 32 Mixed response. KCC interim residential parking standards considered by some respondents to be inadequate and that SDC should formulate its own parking standards, tailored to Sevenoaks. Flexibility within the policy, to depart from the standards where appropriate, is welcomed. Suggestion to remove reference to 'maximum parking standards' in light of recent government advice to adopt a more flexible approach.

Policy GRN1 Green Infrastructure (GI) and New Development

- 33 Strong support for the approach to development a GI network. Excellent work on GI in the countryside but suggest further work on urban/semi-urban areas. Query the context for making judgements of schemes under this policy and suggested textual amendments. Recommendation that policy should contain a vision for the future GI network detailing areas for improvement or for multifunctional use. Suggest further references to AONB, heritage GI features, Biodiversity Action Areas and monitoring criteria.

Open Space Provision

- 34 Strong support. Additional information required regarding existing open space provision and protection before a response can be made. Suggestion that lakes and open water be added as an open space typology and that mineral and waste sites may provide open space in the longer term.

Policy GRN2 Reuse of School Playing Fields

- 35 Strong support for the approach. Suggested textual amendments to strengthen policy. KCC response that policy does not give sufficient flexibility for its changing educational provision across the District.

Policy EMP1 Employment

- 36 Broad support of policy that protects District's employment land. Suggestion that supporting text should reference Core Strategy policy SP8, but not duplicate the policy. Policy SP8 seeks to retain employment sites unless it can be demonstrated that there is not reasonable prospect of their uptake for business purposes in the plan period. Recommendation that EMP1 relates to improvement of employment provision, whereas SP8 relates to protection of existing sites.

Policy LC1 Sevenoaks Town Centre

- 37 General support, subject to regular review and flexibility, due to rapidly changing retail market. Suggestion that policy related to protection of primary retail frontage should be worded more flexibility in line with national policy PPS4, and include provision for the evening economy. Comment regarding policing requirements associated with late night uses.

Policy LC2 Swanley Town Centre

- 38 General support. Comments as above re PPS4. Suggestion to include Station Road in primary or secondary frontage. Query regarding the location/definition of 'prominent' retail units. Comment regarding policing requirements associated with late night uses.

Policy LC3 Edenbridge Town Centre

- 39 General support, subject to regular review and flexibility. Maintenance of minimum 60% ground floor units in A1 uses considered appropriate. Comment regarding policing requirements associated with late night uses. Query regarding why Edenbridge has a higher % of units to be retained in A1 use than Swanley, when it is lower in the settlement hierarchy

Policy LC4 Neighbourhood Centres

- 40 General support. Concern regarding impact of supermarkets on neighbourhood centres raised. Boundary amendments proposed in relation to St John's Hill neighbourhood centres. Further explanation of 'broad ratio' required. Policing comments as above.

Policy LC5 Village Centres

- 41 General support. Some boundary amendments/additions proposed in Otford, Brasted, Leigh and Eynsford. Suggestion that the policy should be extended to afford protection to shops and services in smaller rural communities without a village boundary. Refer to 'community right to buy' initiative.

Policy LT1 Hotels and Tourist Accommodation

- 42 Strong support. Suggestion to reference potential impact of tourist facilities on ecology / biodiversity / and openness of green belt.

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Policy LT2 New Tourist Attractions and Facilities

- 43 Mixed support. Policy considered too restrictive and should adopt a more flexible approach in line with national policy PPG2/PPG4 and allow for replacement buildings/new tourist buildings. Tourism considered important for the local economy and tourist development in the green belt may be appropriate. Suggestion to reference potential impact of tourist facilities on ecology / biodiversity / and openness of green belt.

Policy LT3 Equestrian Development

- 44 General support with minor textual changes. Development of supplementary guidance (SPD) welcomed. Suggestions to reference off-road riding areas, sufficient land available to support horses and cumulative impact of equestrian development on landscape quality.

Policy LT4 Brands Hatch

- 45 Mixed support. Preference expressed for the retention of Local Plan policies WK2 and WK6. Comments in relation to noise pollution and that development should only be supported if there is a reduction in noise levels.

Key Implications

Financial

- 46 Budgetary provision has been made for the cost involved in preparing the Allocations and Development Management DPD. Combining the Allocations and development policies into one document will achieve a significant budget saving in publication and examination costs compared with maintaining two separate DPDs.

Community Impact and Outcomes

- 47 The preparation of the Draft Policies for Consultation had close regard to the Community Strategy vision of safe and caring communities, a green and healthy environment and a dynamic and sustainable economy. The Draft Policies for Consultation as a whole are consistent with the Core Strategy DPD and Community Strategy and contributes either in a leading or supporting role to the implementation of many of the Community Strategy priorities. Overall the Draft Policies for Consultation will be a key aspect of the implementation of the Core Strategy, which should lead to a wide range of positive outcomes for the community.

Legal, Human Rights etc.

- 48 The preparation of an LDF is a requirement under planning legislation. The adopted Allocations and Development Management DPD will form part of the "Development Plan" and has special status in the determination of planning applications. There are requirements regarding notification of interested parties and the production of a statutory notice at the adoption stage and these procedures will be followed.

Equality Impacts

- 49 An updated Equality Impact Assessment was carried out for the Core Strategy in accordance with Council policy. The Draft Policies for Consultation is in conformity with the Core Strategy, however an independent Equality Impact Assessment will be carried out as the document moves towards publication stage.
- 50 The findings of the Core Strategy appraisal have been taken into account in finalising this document.

Sustainability Checklist

- 51 A Sustainability Appraisal report of the Draft Policies for Consultation has been carried out in accordance with Government guidance. A copy has been placed in the Members Room and is available on CMIS.

Conclusions

- 52 It is recommended that the Allocations and Development Management Policies Consultations be noted and the document progressed to the publication stage.

Risk Assessment Statement

- 53 LDF documents are subject to independent examination and the principal risk involved with their preparation is that the examination finds the document to be unsound. The Allocations and Development Management DPD must be in accordance with the Core Strategy and other parts of the development plan and national planning guidance. Following this informal consultation stage the document will progress to publication in which the Council will be required to meet the requirements as set out in the Town and Country Planning Local Development (England) Regulations 2008, at which time it will formally seek the views of key stakeholders in accordance with the Council's Statement of Community Involvement.

Appendices:

Appendix A – List of organisations/individuals who responded to the consultation

Appendix B – Summary of representations

Background Papers:

The Core Strategy DPD

Allocations (Options) DPD

Draft Sustainability Appraisal Report

Planning Policy Statement 12: Local Development Frameworks

Contact Officer(s):

Hannah Gooden (Ext 7178)

Kristen Paterson

Community and Planning Services Director

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Item No. 6 Appendix A

**List of Respondents to the Development Management draft policies for
consultation**

Name	Organisation
South East Water	Adams Hendry
Brian Chandler	Ark Projects Ltd
Mr and Mrs K Vizard	Ark Projects Ltd
P Cruickshank	Ark Projects Ltd
Adrian Standing	Ark Projects Ltd
Alison de Jager	Ash-cum-Ridley Parish Council
Christina Wilton	Brasted Parish Council
Leigh Family	Carter Planning Limited
Derek Johnson	Chevening Parish Council
James Wickham	Chipstead Sailing Club
Rachael Bust	Coal Authority
Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)
John Sparrow / Matthew Blythin	DHA Planning
Tracy Godden	Dunton Green Parish Council
Christine Lane	Edenbridge Town Council
Paul Crick	Environment & Planning Division Kent County Council
Jennifer Wilson	Environmental Agency
Holly Ivaldi	Eynsford Parish Council
L Moss	Fawkham Parish Council
Graham Simpkin	Graham Simpkin Planning
Armstrong (Kent) LLP Christopher Hill	GVA Grimley
Gillian King Scott	Halstead Parish Council
J Hoad	Hartley Parish Council
Ms Hollingdale	Health and Safety Executive
Councillor Tony Austin	Hextable Parish Councillor
Tracy Lane	Hextable Parish Council
Ruth Childs	High Weald AONB Unit
Timothy Ball	JHD Architects
Y Tredoux	Kemsing Parish Council
Jennifer Bate	Kent Downs AONB
Bob White	Kent Highway Services
Trevor R Hall	Kent Police Developer Contributions Manager

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Debbie Salmon	Kent Wildlife Trust
Janice Butler	Leigh Parish Council
Ken Grist	Manzoori Patients Forum
Dennis Pope	Nathaniel Lichfield & Partners
National Grid	Nathaniel Lichfield & Partners
John Lister	Natural England
John Henderson	NDD SE Planner Highways Agency
Helen Milner	Network Rail
Ms Brenda Hambrook	Otford Parish Council
Cooper Estates Limited	Paul Watson Phillips Planning Services
Simon McFarlane	Planning Issues
United House	Planning Potential Ltd
Stephen Ingram	Primary Care NHS Kent & Medway
Cooper Estates Limited	Robin Buchanan
Robinson Escott	Robinson Escott Planning
Clark's College Ltd	Robinson Escott Planning
Sawyers Park Homes	Robinson Escott Planning
Jo Tasker	Robinson Escott Planning
Mark Batchelor	Robinson Escott Planning
	Safety Regulation Group CAA
Lorna Talbot	Seal Parish Council
Sir Michael Harrison	Sevenoaks Conservation Council
Susan Pittman	Sevenoaks Protect Kent
Hugh D'Alton	Sevenoaks Town Council
B Ide	Shoreham Parish Council
Sarah Harrison	Southern Water
David Lamb	Surrey County Council
Christopher Drake	Swanley Town Council
J.L Phillips	Tandridge District Council
Mike Tatham	Tatham Homes Ltd
Philip Jameson	Thames Water Property
McCarthy and Stone Retirement Lifestyles Ltd	The Planning Bureau Ltd
F Marshall	The Sevenoaks Society
R Freeman	The Theatres Trust

Item No. 6 Appendix A

Lynda Harrison	West Kingsdown Parish Council
Angela Howells	Westerham Parish Council
Alice de la Rue	
Andrew Michaelides	
Barbara Ayres	
Cllr John Edwards-Winser	
Colin Dibsdall	
D.A.T Siggins	
Hobson	
James Tagg	
Karen Jefferys	
Leslie Robis	
M Johnson	
Mr A Lee and Ms Ackleton	
P Brazier	
Thomas Rand	

Development Management Draft Policies Representations – August 2011

Ref No	Name	Organisation	Nature of Representation	Summary
Development Management Draft Policies General Comments				
DM187	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	Polices should be worded in a positive way to follow the Government's approach set out within the Draft National Planning Policy Framework
DM211	Derek Johnson	Clerk Chevening Parish Council	Object to the approach or wording	There is a lack of specific measures regarding safeguarding air quality, development from flooding and the provision of cycle ways to Sevenoaks station.
DM272	Holly Ivaldi	Clerk Eynsford Parish Council	Object to the approach or wording	Nothing about new technologies, such as masts, dishes, antennae, solar panels or wind turbines. These are specific enough to require individual consideration or retention of village amenities other than shops, e.g. car parks and community halls etc. which again require specific consideration. No general consideration of expansion of commercial activities in the Green Belt. No policy reference to housing. For example, is the council looking at use of flats over high street business premises in urban areas?
DM281	James Tagg		Object to the approach or wording	Criticism of the consultation process, not relevant to the consultation document.
DM303	Philip Jameson	Thames Water Property	Object to the approach or wording	Suggest new policy and supporting text dealing with water and sewerage infrastructure capacity.
DM383	Jennifer Bate	Kent Downs AONB	Object to the approach or wording	Greater importance to be placed on AONBs
DM402	Sarah Harrison	Southern Water	Object to the approach or wording	Policy Omission Propose; Wastewater Infrastructure Provision New development will be permitted provided the wastewater infrastructure required to serve it is either available, or can be provided in time to serve it.
DM503	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	Appendix 2: <ul style="list-style-type: none"> • Local Plan Policy EN1 is also replaced by Policy SC1 • Local Plan Policy EN9 is replaced by Policies GRN1 & GRN2 • Local Plan Policy EN26 is also replaced by Policy GRN1 • Local Plan Policy NR10 is replaced by Policy SC3 not SC2 • Local Plan Policies H16, H17, H18 & H19 are not replaced by Policy H3

Ref No	Name	Organisation	Nature of Representation	Summary
DM504	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	The following policies EN34, T8, T9, T10, VP11, EP13 and S4 all remain relevant and should be carried forward into the DPD
DM6	Karen Jefferys		Support the approach subject to changes	Swanley should not be singled out as an area that should become more urbanised (5.6). There should be more benefits required of developers to current locals. Requirements should be enforceable.
DM202	R Freeman	The Theatres Trust	Support the approach subject to changes	Glossary would be useful to list the use classes including sui generis designations, for clarity.
DM313	James Wickham	Chipstead Sailing Club	Support the approach subject to changes	Allocations and development management document should take adequate account of the needs of water-based recreational activities
DM384	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Para 1.16 Add to bullet points •Landscape character
DM387	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Would like to see encouragement given to ensuring new development uses renewable sources of energy.
DM442	Angela Howells	Clerk Parish Council Westerham	Support the approach subject to changes	Given that Westerham town is recorded as such an area, the Parish Council welcomes the requirement that development in areas of poor air quality must incorporate mitigation measures.
DM472	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Given the generalised nature of the NPPF, it will be important to consider whether or not more detail is required in the DPD to support the proposed policies. Also, it may necessitate the inclusion of additional policies to cover topics previously dealt with in more detail in the PPGs/PPSs. Ideally, after the NPPF is finalised, an opportunity should be provided to interested parties to suggest what additional detail/policies should be provided before the DPD is finalised.
DM506	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Policies LC1 - 4 do not consider that the policy replaces Local Plan Policy S6 (and neither does Appendix 2). Para 9.29 the Policy referred to should be LC5 not LC6.
DM3	Ms Hollingdale	Health and Safety Executive	Support the approach	Suggest general statement on major hazard sites. "The Planning Authority has been advised by the Health and Safety Executive of consultation zones for each major hazard site and pipeline. In determining whether or not to grant planning permission for a proposed development within these consultation zones, the Planning Authority will consult the Health and Safety Executive about risks to the proposed development from the major hazards in accordance with Circular 04/00."

Ref No	Name	Organisation	Nature of Representation	Summary
DM4 DM8 DM10	Rachael Bust David Lamb	Safety Regulation Group CAA Coal Authority Surrey County Council	Support the approach	No Specific Comments
<u>Policy SC 1 Sustainable Development</u>				
DM5	McCarthy and Stone Retirement Lifestyles Ltd	The Planning Bureau Ltd	Object to the approach or wording	The requirements to meet Code Level should be left for the Building regulations
DM48	Trevor R Hall	Developer Contributions Manager Kent Police	Object to the approach or wording	It is flawed without reference to require developers to identify how they intend to create safe and accessible environments where crime and disorder or the fear of crime does not undermine quality of life or community cohesion. There needs to be a condition on developers that all new developments must comply with ACPO Secured by Design. This would also ensure developments do not undermine quality of life or community cohesion and assist Sevenoaks District Council to discharge its responsibilities under the Crime and Disorder Act and PPS1.
DM150	John Lister	Natural England	Object to the approach or wording	The bullet points should be clarified and emphasis put on the importance of landscape, habitats, biodiversity and access to the natural environment (a) should indicate that “compatibility with location” seeks to ensure that proposals fit well with their landscape setting/context, protect key on-site features and add components that deliver enhancement. (b) should ensure protection and enhancement of the environment, including habitat, access and other networks that link with features around the site.
DM204	Derek Johnson	Clerk Chevening Parish Council	Object to the approach or wording	Add: f. the ability of infrastructure such as roads and services to support the development.
DM275	B Ide	Shoreham Parish Council	Object to the approach or wording	Add criterion f. the maintenance of the Green Belt and the enhancing and conserving the AONB designations. This will give added protection to land with Green Belt and AONB status.
DM289	Hobson		Object to the approach or wording	Add f. the maintenance of the Green Belt and the enhancing and conserving the AONB designations.

Ref No	Name	Organisation	Nature of Representation	Summary
DM385	Jennifer Bate	Kent Downs AONB	Object to the approach or wording	Add bullet point: • The conservation and enhancement of the District's AONBs
DM426	Jennifer Wilson	Environmental Agency	Object to the approach or wording	The terminology and wording used in this policy is not robust enough.
DM70 DM108 DM301	Christine Lane Tracy Godden Philip Jameson	Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council Thames Water	Support the approach	Support
DM14	Thomas Rand		Support the approach subject to changes	Add an further criteria : Social progress which recognises the needs of everyone. Add wording that development should reflect the Local needs and circumstances of everyone.
DM148	John Lister	Natural England	Support the approach subject to changes	The following Core Strategy Objectives should be included in para 9.1 as they are relevant to consideration of Development Management issues. To ensure that any infrastructure and service improvements needed to support delivery of Core Strategy objectives and policies or resolve existing deficiencies are brought forward in a co-ordinated and timely manner and that new development makes an appropriate contribution towards any improvements required as a result of new development. (Key Issue 10) - To safeguard existing open spaces, sport and recreational facilities that meet community needs and improve provision where necessary. (Key Issue 10) - To maintain and enhance the biodiversity of the District including provision of a network of habitat corridors as part of the Green Infrastructure Network. (Key Issue 3)
DM217 DM137	Brenda Hambrook Cllr John Edwards-Winser	Oxford Parish Council	Support the approach subject to changes	The meaning of 'a balanced community' in this context should be clarified. Add new criteria "The development should not have an adverse effect upon local homes or the sustainability of local businesses".
DM246	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Point (b) should include more detail. Impacts may include such things as air pollution, water pollution, light pollution, noise pollution, soil erosion and damage to ecology. Point (c) how is "balanced communities" defined?

Ref No	Name	Organisation	Nature of Representation	Summary
DM302	United House	Planning Potential Ltd	Support the approach subject to changes	Further emphasis should be given to promoting the effective use of land, promoting mixed use developments that create more vibrant places, and encouraging multiple benefits from the use of land in urban areas, as set out in the draft NPPF.
DM320	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	The following wording should added to section b of SC1. b. the impact of the proposal on the surrounding environment, and any natural habitats and biodiversity.
DM332	Armstrong (Kent) LLP	Christopher Hill GVA Grimley	Support the approach subject to changes	Policy SC1 and the supporting text should take account of the NPPF and its definition of sustainable development. It should be amended and expanded to reflect these factors with significant weight to be given to the benefits of economic and housing growth.
DM336	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	'e' the contribution to the District's economy and employment Recommend a 6th point, along the lines of "Does not place undue strain on existing local infrastructure"
DM359	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Recommended the following objective is included "To maintain and enhance the biodiversity of the District including provision of a network of habitat corridors as part of the GI."
DM360	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Support the principles Specific reference could be made to the need to have regard to the conservation and enhancement of biodiversity/local and national designations.
DM405	Janice Butler	Leigh Parish Council	Support the approach subject to changes	Add effect on transport, i.e. to enable use of public transport rather than relying on cars. Add 'avoidance of building on flood plain'.
DM465	F Marshall	The Sevenoaks Society	Support the approach subject to changes	Clarity required on tandem development.
DM474	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Add "and natural assets" to the end of criterion d); and add a new criterion that recognises the need to maintain the Green belt.
<u>Policy SC2 Design Principles</u>				
DM1	Bob White	Kent Highway Services	Object to the approach or wording	Under General Design Principles there is the opportunity to include post-occupation evaluation alongside Building for Life.

Ref No	Name	Organisation	Nature of Representation	Summary
DM152	John Lister	Natural England	Object to the approach or wording	Para 1.19 omits the need to seek enhancements, contrary to the Core Strategy Objective which refers to “maintain and enhance”. This is particularly important in view of the pressures on habitats and biodiversity arising from a range of factors including: development, recreational and economic use of the countryside & rural fringes, and climate change.
DM155	John Lister	Natural England	Object to the approach or wording	d should recognise that sites may currently provide walking and cycling routes between communities and a range of facilities and opportunities, including routes to Accessible Natural Green Spaces and the wider countryside. These routes should be protected and/or new opportunities captured.
DM206	Derek Johnson	Clerk Chevening Parish Council	Object to the approach or wording	SDC should formulate and use its own parking provision criteria instead of using those of Kent County Council, reflecting the greater emphasis on car usage in Sevenoaks.
DM215	Y Tredoux	Kemsing Parish Council	Object to the approach or wording	Add to last paragraph "Where appropriate proposals should include details and strategies for the effective management and maintenance of sites following their completion" This should enable the Council to ensure that there is no undue delay in carrying out the approved works and leaving the site in a neat and tidy state.
DM262	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	The use of the word "respond" within the policy should be replaced with the word "complement" to be consistent with the term used in paragraph 16 of PPS3.
DM304	United House	Planning Potential Ltd	Object to the approach or wording	A character study should be prepared in support of Policy SC2.
DM337	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	No mention of the effects on local infrastructure. Would like to see “design quality” defined Point d should be amended to read “provide adequate parking facilities of a standard appropriate to the development, which may exceed the standards set by KCC” Welcome further positive action to maintain front gardens with combined parking facilities. Both external and internal ease of access must be considered; all houses designed for “lifetime use” Regret excessive development of “gated communities” Would like to see a clause preventing tandem development
DM361	Paul Crick	Environment and Planning Division Kent County	Object to the approach or wording	Criterion (b) should be amended to say: “The layout of the proposed development should respect the topography of the site and retain and enhance important Green Infrastructure Network features including trees, hedgerows, shrubs and

Ref No	Name	Organisation	Nature of Representation	Summary
		Council		<p>established water courses and ponds.”</p> <p>Criterion (e) should be amended to say: “The proposal should incorporate within the design opportunities for increasing biodiversity potential where possible. Proposals that affect a site’s existing biodiversity should be designed in a way that avoids and/or mitigates any potential harm.”</p>
DM427	Jennifer Wilson	Environmental Agency	Object to the approach or wording	<p>Recommend that the following point is reworded as follows: “(b) The layout of the proposed development should respect the topography of the site, protect and enhance the Green Infrastructure Network features including trees, hedgerows and shrubs and any established water courses or ponds”</p>
DM13	Karen Jefferys	Natural England	Support the approach	Support e) is welcomed.
DM15	Thomas Rand			Emphasis on good design Council should seek specialist advice on design matters.
DM156	John Lister			
DM466	F Marshall	The Sevenoaks Society		
DM49	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	<p>Recommends the following wording changes g) ‘The design of new developments should incorporate adequate security measures and features to deter crime, fear of crime, disorder and anti social behaviour’. Supports d) but would strongly recommend the following: ‘The proposed development should ensure satisfactory means of access for vehicles and pedestrians and provide adequate off road parking facilities for residents and visitors with other appropriate measures to mitigate the risk of obstruction to emergency service vehicles’.</p> <p>Recommend b) is amended to the following: ‘The layout of the proposed development should respect the topography of the site, retain important Green Infrastructure Network features including trees, hedgerows and shrubs, and enhance any established water courses or ponds whilst mitigating the risk of flooding of the site’.</p> <p>Also recommend that the nationally accepted standard for designing out crime and disorder the ACPO Secured by Design, Park Mark and Crime Prevention Through Environmental Design (CPTED) initiatives should be complied with, as relevant to the development, and should be incorporated within the policy</p>
DM71	Christine Lane	Town Clerk	Support the approach	Add the following to b) ‘and enhance any established water courses or ponds’- changes in the flood

Ref No	Name	Organisation	Nature of Representation	Summary
		Edenbridge Town Council	subject to changes	plain or river basins need very careful consideration; enhancement could have detrimental effects on other areas.
DM109	Tracy Godden	Clerk Dunton Green Parish Council	Support the approach subject to changes	(d) needs further explanation of what 'vehicles' means in this context. Does this relate to cars or is the criteria supposed to ensure service vehicle access is considered? Add criteria to ensure fire, ambulance / police services have adequate access to a development site.
DM154	John Lister	Natural England	Support the approach subject to changes	c) should note that there will be cases where buildings and structures house protected species, which should be retained or, in exceptional cases, provision made for the professional and managed relocation of species.
DM218	Brenda Hambrook	Oxford Parish Council	Support the approach subject to changes	In terms of 'security' it should be clarified that this does not imply approval of 'electric-gating' and high-fencing used to stockade homes.
DM138	Cllr John Edwards-Winser			""Design Principles" Additional criteria should be added - to require clear descriptions of materials and colours to be employed in the completed building which are compatible with near-by buildings. These shall constitute an integral part of the planning application.
DM247	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Point (e) should say '...prevents any potential harm or by exception mitigates'. Tandem development should not be permitted. Landscaping should be incorporated into a design and benefit the environment. Point (d) refers to "adequate parking facilities" - what does adequate mean in this context? It is important that there is sufficient road space to allow safe and easy access for service and emergency vehicles.
DM305	United House	Planning Potential Ltd	Support the approach subject to changes	Consider that some flexibility is required with regards to amenity protections, particularly for sites which seek the reuse of brownfield land where there may be more constraints.
DM321	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	Further wording required to strengthen policy. Should read; b) The layout of the proposed development should respect the topography of the site, retain enhance, extend, connect and recreate important Green Infrastructure Network features including trees, hedgerows, shrubs, established water courses or ponds and habitats of principal importance. Provision should be made to maintain and increase populations of protected species and species of principal importance;

Ref No	Name	Organisation	Nature of Representation	Summary
				e) The proposal should incorporate within the design opportunities for increasing and extending biodiversity potential such as corridors and stepping stones of natural habitat and landscape enhancement for biodiversity. Proposals that affect a site with existing biodiversity importance should be designed in a way that mitigates any potential harm;
DM386	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	b) Add bullet point: <ul style="list-style-type: none"> The proposal should incorporate within the design opportunities for conserving and enhancing the landscape character of the area, for example by attention to boundary treatments, design of accesses streets and lanes, and the design of spaces and GI throughout the site.
DM406	Janice Butler		Support the approach subject to changes	Ensure balance is maintained between (a) social housing and private houses and (b) mix of sizes, e.g., 2,3,4 or more bed roomed houses, with reference to the Village Design Statement.
DM419	National Grid	Nathaniel Lichfield & Partners	Support the approach subject to changes	Proposed amendment relates to ensuring flexibility in the drafting of the policy b) The layout of the proposed development should respect the topography of the site, retain important Green Infrastructure Network features where appropriate, including trees, hedgerows and shrubs, and enhance any established water courses or ponds;"
				It is considered that this revised wording allows for a proper assessment on a site by site basis in respect of the need to retain landscape features.
DM475	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Add "and important views through the site" to the end of criterion c); Add "so that there is no net loss of biodiversity" to the end of criterion e); and Add Policy H6B to the list of Local Plan policies to be replaced by this policy in Appendix 2.
<u>Policy SC3 Amenity Protection</u>				
DM193	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	The use of the term "will only be permitted" and "will be resisted" creates a negative policy. The removal of the word "only" and a rewording of the last sentence would create a positive policy.
DM403	Sarah Harrison	Southern Water	Object to the approach or wording	SC3. suggest the following wording: Development proposals in proximity to existing wastewater facilities will only be permitted if there is no unacceptable impact on the amenity of future occupants. The distance between the infrastructure and the development must be sufficient to allow adequate odour dispersion.
DM407	Janice Butler		Object to the approach or wording	More definition is needed with regard to "Excessive" Protection of amenity is basically affected by housing density; definition required and how this differs

Ref No	Name	Organisation	Nature of Representation	Summary
				in towns, villages and in the countryside. Safeguarding open spaces and the Green Belt is part of "Protecting Amenity"
DM476	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	The final sentence needs to be clarified Policy S6 should be added to the list of Local Plan policies to be replaced by this policy in Appendix 2.
DM16 DM110 DM139	Thomas Rand Tracy Godden Cllr John Edwards-Winser	Clerk Dunton Green Parish Council	Support the approach	Support approach
DM467	F Marshall	The Sevenoaks Society	Support the approach	Support policy but consider obscure glazing/secure windows unacceptable as a result of bad design
DM50	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	Recommend the inclusion that the development does not result in increasing crime and disorder. This can be mitigated by developers by incorporating Secured by Design, Park Mark and/or CPTED within the design.
DM72	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	The word 'outlook' is very subjective, clarification is needed over what constitutes a outlook worth preserving.
DM185	Lynda Harrison	Clerk West Kingsdown Parish Council	Support the approach subject to changes	The wording should include " noxious emissions , dust, vibration light or heat" as in policy NR10 of the saved policies of the SDLP
DM248	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	The policy mentions "outlook", something that has not been seen in policy before. What does this mean? Does it infer the right to a view?
DM338	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	Occupants and future occupants of the development must also be safeguarded. Must be adequate provision for the storage of vehicles and refuse. Clarification on the meaning of 'proposals that introduce uses sensitive to environmental policy'
DM362	Paul Crick	Environment and Planning Division	Support the approach subject to changes	Should refer specifically to air pollution as this is an important issue in Sevenoaks as it is the District with the most AQMA's in the County.

Ref No	Name	Organisation	Nature of Representation	Summary
		Kent County Council		
DM420	National Grid	Nathaniel Lichfield & Partners	Support the approach subject to changes	This amendment is suggested: "Proposals that introduce uses sensitive to poor environmental quality into an area will be resisted unless amenity for future users can be adequately safeguarded, such as through appropriate environmental improvements."
DM424	Lorna Talbot	Parish Clerk Seal Parish Council	Support the approach subject to changes	Should this not also refer to the amenity of the future occupiers of the property being developed (it only refers to occupiers of nearby properties).
DM428	Jennifer Wilson	Environmental Agency	Support the approach subject to changes	Are unclear what the last sentence is trying to say. The word "resisted" should be replaced by "refused" so that it is clear to the reader what you wish prevented and to also make the policy robust.
<u>Policy SC4 Reuse of Redundant School Buildings</u>				
DM197	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	This policy requires consideration in relation to its impact on a proposal to relocate a school. A revised policy wording to incorporate consideration of viability in certain circumstances should be considered. This policy should be re worded in a positive way to follow the approach set out within the Draft NPPF.
DM339	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	Care needs to be taken to ensure doesn't undermine the viability of existing community facilities. Opportunities from school facilities There is no provision for buildings which have come to the end of their natural life span.
DM73	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach	Support
DM111	Tracy Godden	Clerk Dunton Green Parish Council		
DM43	Christopher Drake	Assistant Town Clerk Swanley Town Council	Support the approach subject to changes	If suitable facilities are nearby then part of any proposals should include a 106 Agreement for funding
DM51	Trevor R Hall	Developer Contributions Manager Kent	Support the approach subject to changes	Have concerns as to the sustainability of such changes of use and, therefore, the robustness of proposed Policy . Many school sites are large with associated playing fields and, therefore, the proposed policy may be counter productive leading to a low take up of the sites by developers resulting

Ref No	Name	Organisation	Nature of Representation	Summary
		Police		in further decay and increased criminality/disorder/anti social behaviour which would have a significant negative impact on local residents and Kent Police business
DM140 DM219 DM408	Cllr John Edwards-Winsor Brenda Hambrook Janice Butler	Otford Parish Council Leigh Parish Council	Support the approach subject to changes	Suggest the addition of - Use re-conversion as potential conversion to apartments for older local residents
DM253	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Re-use of redundant school buildings should allow for use for recreation and sports. How will it be determined that there is no other need taking into consideration changes in population size etc? (para 1.28)
DM363	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	The stated policy is too rigid.
DM477	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	It should be re-drafted to better reflect the sequential approach explained in paragraph 1.28. Consequently, acceptable uses for redundant school buildings should be considered in the following order: Community use; then Residential Care/institutions and/or affordable housing; then Employment (B1 uses only); and then General residential (including the normal requirement for affordable housing).
Policy SC5 Loss of Neighbourhood Services and Facilities				
DM201	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	A more precise definition of a neighbourhood service should be added to the policy. Is a public house a neighbourhood service?
DM112	Tracy Godden	Clerk Dunton Green Parish Council	Support the approach	Resistance of loss of services and facilities is commendable but how, in practice will the Council be able to ensure that operation is continued given that the reason for withdrawal of services and facilities is very often financial?
DM207	Derek Johnson	Clerk Chevening Parish Council	Support the approach	Endorse and support

Ref No	Name	Organisation	Nature of Representation	Summary
DM478 DM481	Councillor Tony Austin Ken Grist	Hextable Parish Council Secretary Manzoori Patients Forum	Support the approach	Promotion of Hextable Heritage Site as preferred location for a new GP surgery.
DM74	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	Should this policy be re-worded to take account of the 'Community Right to Build'. Offering the opportunity where the service is deemed no longer financially viable.
DM141	Cllr John Edwards-Winser		Support the approach subject to changes	Financial considerations should be taken into account, but as an ageing population it should not be the only criteria.
DM254	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Loss of services should equally apply to rural settlements.
DM340	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	Would like confirmation that distance is covered within "equally accessible" also means nearby
DM364	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	It is considered that this policy should be redrafted to support service providers. The policy should recognise that this might include the closure of some facilities
DM433 DM434	Stephen Ingram	Primary Care NHS Kent & Medway	Support the approach subject to changes	Overview of GP facilities in Swanle, Hextable and Sevenoaks
Policy ECC1 Outdoor Lighting				
DM220 DM142	Ms Brenda Hambrook Cllr John Edwards-Winser	Otford Parish Council	Object to the approach or wording Support the approach subject to changes	Suggest the following criteria A: The effects of lighting must be assessed on areas beyond the curtilage of the development. i.e the effect upon neighbouring homes/ country areas. B: Parishes which have a 'no-public lighting' policy must be given additional consideration in all applications within - or on the borders of - those parishes.
DM277	B Ide	Shoreham Parish Council	Object to the approach or wording	b) could be ambiguous. It could be interpreted that alignment of lamps is to be minimised or that the provision of shielding should be minimised.

Ref No	Name	Organisation	Nature of Representation	Summary
				Suggest the following wording:- b) The impact and suitability of the lighting intensity, alignment of lamps and provision of shielding in relation to light pollution and impact upon the night sky is minimised;
DM291	Hobson		Object to the approach or wording	Policy should be rewritten as; b) The impact in relation to light pollution and the impact on the night sky has been minimised by suitable lighting intensity, alignment of lamps and provision of shielding;
DM341	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	There does not appear to be any policy covering water pollution or flooding. . Point 2.15 mentions PPG25, which is soon to be abolished.
DM342	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	There needs to be restrictions on hours lighting can be on. All public facilities should always have conditions restricting their hours of use no mention of energy efficiency
DM409	Janice Butler	Leigh Parish Council	Object to the approach or wording	Re Flooding Would like to be added 'provision of hard standing will only be permitted where measures are taken so there is no surface run off.'
DM429	Jennifer Wilson	Environmental Agency	Object to the approach or wording	Detailed comments on water and flooding
DM463	South East Water	Adams Hendry	Object to the approach or wording	Request therefore that the DPD includes a specific policy or policies
DM479	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	Paragraph 2.8 should recognise composting alongside recycling, and should make reference to waste prevention which is at the top of the waste hierarchy.
DM480	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach	Welcome the recognition that lighting is an aspect of tranquillity. It should include a reference to the use of low energy lighting as in Local Plan Policy EN31.
DM75	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach	c) 'harmful impact on privacy or amenity for nearby residential properties'. What constitutes harmful? Could all artificial light be considered as harmful as light pollution? This needs clarification
DM388	Jennifer Bate	Kent Downs AONB	Support the approach	Support this policy and mention of the sensitivity of the AONB to light pollution.
DM52	Trevor R Hall	Developer Contributions	Support the approach subject to changes	Recommends the inclusion of a further criterion: 'Any potential on crime, disorder and/or anti social behaviour is mitigated'

Ref No	Name	Organisation	Nature of Representation	Summary
		Manager Kent Police		
DM113	Tracy Godden	Clerk Dunton Green Parish Council	Support the approach subject to changes	More consideration should be given to the environmental impact of artificial lighting given that the District is 'a predominantly rural area' in which you would not expect there to be the same degree of lighting as in urban areas?
DM255	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Clarification is needed as to whether this would exclude lighting for things like outdoor tennis courts and swimming pools
DM365	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Green Infrastructure is an integral part of climate change adaptation and it is recommend the inclusion here of the Core Strategy objective: "To maintain and enhance the biodiversity of the District including provision of a network of habitat corridors as part of the Green Infrastructure Network." Criterion (e) should be amended to say: "Potential impacts on wildlife are avoided, or adequately mitigated where avoidance is not possible"
DM366	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	There is no reference to AQMA's in this paragraph. The Kent and Medway Air Quality Partnership have recently published technical guidance on considering planning and air quality this can be found at www.kentair.org.uk
DM435	Angela Howells	Clerk Westerham Parish Council	Support the approach subject to changes	Outdoor lighting is highly intrusive in hilly countryside and Westerham parish, particularly in Crockham Hill, does suffer from its impact.
Policy EEC2 Noise Pollution				
DM188	Lynda Harrison	Clerk West Kingsdown Parish Council	Object to the approach or wording	Policy WK6 relates specifically to excessive noise disturbance in West Kingsdown, policy LT4 does not adequately replace it. The following additions should be made ECC2. "The local planning authority will not permit new development particularly housing , in areas subject to excessive noise disturbance"
DM221 DM143	Brenda Hambrook Cllr John Edwards-Winser	Otford Parish Council	Object to the approach or wording	Any form of noise pollution within a conservation area should not be permitted at any time. Any form of noise pollution within a conservation area should be minimised at all times.
DM278	B Ide	Shoreham Parish Council	Object to the approach or wording	Change "high noise" to "noise" in the final sentence as the word 'high' is meaningless and open to interpretation.

Ref No	Name	Organisation	Nature of Representation	Summary
DM292	Hobson		Object to the approach or wording	High noise is very subjective. Therefore, in relation to AONBs, change "high noise" to "noise" in the final sentence.
DM114	Tracy Godden	Clerk Dunton Green Parish Council	Support the approach	Support
DM389	Jennifer Bate	Kent Downs AONB	Support the approach	Support this policy and should mention of the sensitivity of the AONB to noise pollution.
DM76	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	Under a). 'unacceptable impact' unacceptable to whom? This needs clarification.
DM306	United House	Planning Potential Ltd	Support the approach subject to changes	Consider that some flexibility is required with regards to amenity protections, particularly for sites which seek the reuse of brownfield land where there may be more constraints.
DM322	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	Recommend a further clause is added to the policy:- c) Will not result in activities which will cause disturbance to designated sites and nature reserves managed for their bird populations
DM482	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	The word "high" should be deleted from the last paragraph.
<u>Policy HA1 Heritage Assets</u>				
DM144 DM222	Cllr John Edwards-Winser Brenda Hambrook	Oxford Parish Council	Object to the approach or wording	Heritage assets should include all items/artefacts discovered below the surface in archaeological excavations. No form of 'intrusive' archaeological survey should take place without application to District Council. A report of findings should be submitted to the Council. Non-intrusive archaeological surveys should require permission from the District Council. Need for local list agreed in advance with the local Parish Council.
DM157	John Lister	Natural England	Object to the approach or wording	Policy HA1 may not reflect national guidance which requires the protection of ancient woodland. The notion of development in an Ancient Woodland and the idea of mitigation of potential harm are matters of great concern and complexity. The provision of new wood land elsewhere does not address loss
DM256	Holly Ivaldi	Clerk Eynsford	Object to the approach or	This policy is inadequate. It will not protect woodland that is lost for example, to agricultural expansion,

Ref No	Name	Organisation	Nature of Representation	Summary
		Parish Council	wording	rather than development. Planning permission should be required. Para 3.4 should specifically include specimen trees. Para 3.6 - Loss of listed buildings to development cannot ordinarily be justified. Para 3.8 – In the last sentence, the term 'destroyed' should be followed by 'or markedly degraded'. Para 3.14 - How will it be decided what qualifies as a heritage asset?
DM115	Tracy Godden	Clerk Dunton Green Parish Council	Support the approach	Support Local List
DM468	F Marshall	The Sevenoaks Society		
DM40	Sir Michael Harrison	Chairman Sevenoaks Conservation Council	Support the approach subject to changes	Policy HA1 and/or the text should be amended to include the intention to compile a local list. To do so would be consistent with national policy in PPS5, and it should be treated as a priority.
DM77	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	The meaning of the second statement is unclear, does it refer to sites where demolition is proposed? Objects to the idea of a local list of important buildings. The Listed Building register provides a high level of protection. Buildings not listed, if important enough add to the character of the area and would be protected as changes could effect the distinctive local character of the area protected under SC2
DM189	Lynda Harrison	Clerk West Kingsdown Parish Council	Support the approach subject to changes	There should be a list of local ancient woodlands, historic parks and gardens as well as important buildings
DM323	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	Recommend that the following wording be added to the policy. Planning application proposals that affect a heritage asset, ancient woodland or its setting, will only be permitted where the development preserves or enhances the character, appearance and settings of the asset through high quality, sensitive design. Applications will be assessed with reference to the prominence of the location, the historic, ecological and architectural value of the asset and the historic and architectural value of the feature to be replaced. In the case of ancient woodland the application should prove that there will be no impact on the ecological integrity of the woodland or the species that use the site. Such application should be accompanied by a full ecological assessment of the ancient woodland and the species present

Ref No	Name	Organisation	Nature of Representation	Summary
DM343	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	Care needs to be taken to ensure that enthusiastic application does not discourage development where neglect would lead to deterioration of buildings Strongly agrees that a local list should be drawn up There needs to be a provision to allow relaxation of conservation requirement where buildings are no longer economically viable.
DM367	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Recommend that the following should be added to the wording of 3.13 and/or included as part of Policy HA1: “...Proposals that would result in the loss or deterioration of ancient woodland will not be granted planning permission unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat.” In the 2nd para it is suggested that the word ‘value’ is replaced by ‘significance’ as this is the preferred term in PPS5. The 3rd para should start with “Where the planning application...” rather than “Where the asset...”
DM390	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Suggest mention of the Kent Farmstead Guidance
DM410	Janice Butler	Leigh Parish Council	Support the approach subject to changes	Would welcome a list of locally important buildings, and wonder where the village Green stands on this and how it is officially classified.
DM483	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	The second para should also refer to landscape. Para 3.1 clearly regards landscapes as part of the heritage assets of the District, but the policy seems to imply that the Policy just relates to historical assets. The Policy should better reflect the supporting text. Policy EN23 should be added to the list of Local Plan policies to be replaced by this policy in accordance with Appendix 2.
<u>Policy HA2 Demolition within Conservation Areas</u>				
DM41	Sir Michael Harrison	Chairman Sevenoaks Conservation Council	Object to the approach or wording	There should be an equivalent policy to EN23. It is not sufficient to rely on other policies such as Policy SC2. There should be a provision in the policy requiring the District Council to consult English Heritage on applications relating to, or otherwise affecting, listed buildings, locally listed or other significant

Ref No	Name	Organisation	Nature of Representation	Summary
				<p>buildings in or adjoining Conservation Areas.</p> <p>There should be a provision within Policy HA2 aimed at preventing the demolition of buildings in Conservation Areas until redevelopment is commenced. Planning permission for demolition and redevelopment should contain a condition prohibiting demolition until the approval of all relevant reserved matters, or a condition prohibiting demolition until the District Council is satisfied about the immediacy of re development.</p> <p>This should be general policy provision for all development.</p>
DM224	Brenda Hambrook	Oxford Parish Council	Object to the approach or wording	<p>There should be a policy to cover the future protection or enhancement of conservation areas throughout the District.</p> <p>A: That highways signage be reduced to the minimum in Conservation Areas. That highways signage only include that required for the safety of pedestrians and traffic.</p> <p>B: That there is a uniformity of shop signage in terms of style, colour and size within a specified Conservation Area.</p> <p>C: That there is no (exterior) advertising or promotional signing (with the exception of parish notice boards) within a specified Conservation Area.</p> <p>D: That the introduction of finger-posts, information boards or directions use local materials and be of a uniform style and colour.</p>
DM344	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	<p>There is no mention of an "All developments must preserve or enhance the Conservation Area"</p> <p>Would like the above policy to apply to developments directly adjacent to Conservation Areas.</p>
DM17	Thomas Rand	Town Clerk Edenbridge Town Council	Support the approach	Support
DM78	Christine Lane			
DM116	Tracy Godden	Clerk Dunton Green Parish Council		
DM145	Cllr John Edwards-Winser		Support the approach subject to changes	Highways signage should be reduced in CAs. Uniformity of shop signage. No exterior advertising or promotional signage. Finger posts, information boards or directions use local materials and be of a

Ref No	Name	Organisation	Nature of Representation	Summary
				uniform style and colour.
DM223	Brenda Hambrook	Oxford Parish Council	Support the approach subject to changes	The local list should be fully agreed in advance with the local Parish Council .
DM257	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Para 3.16 - This should mean presenting plans that show the context of the development, i.e. not just elevations and floor plans but proposed views and street scenes.
DM411	Janice Butler	Leigh Parish Council	Support the approach subject to changes	Add point requiring alterations/additions to buildings in a conservation area to be appropriate to the conservation area, with more consideration given to Village Design Statement.
DM469	F Marshall	The Sevenoaks Society	Support the approach subject to changes	Heritage Assets should be subject to external consultations.
DM470	F Marshall	The Sevenoaks Society	Support the approach subject to changes	Demolition applications should be delayed until all outstanding matters resolved.

Policy GB1 Reuse of Buildings within the Green Belt

DM18	Thomas Rand		Object to the approach or wording	Provides too much protection Use disused Nurseries for sheltered or warden controlled housing
DM146	CLlr John Edwards-Winser		Object to the approach or wording	No enough control. Local neighbourhood should be consulted on re-use of redundant farm buildings. 75% retention of current structure should not be mandatory as it may prove unsafe. Oxford PC should be fully involved with any future SPD.
DM184	Graham Simpkin	Graham Simpkin Planning	Object to the approach or wording	Could also refer to re-use of buildings for holiday accommodation to help meet aspirations for additional tourist accommodation in the District and could cross-reference to the Policies related to Tourist Development. Could also usefully refer to the potential for equestrian use of existing buildings in the Green Belt and cross-reference Policy LT3.
DM192	Lynda Harrison	Clerk West Kingsdown Parish Council	Object to the approach or wording	There needs to be a condition to cover criteria 1) of existing policy GB3B, " where the building itself or other buildings within a related group have been constructed within the last 10 years it will be necessary to demonstrate that there was a genuine agricultural justification for the building when originally constructed " In order to give the same protection to the ANOB as existing policy GB3A the sentence " The creation of

Ref No	Name	Organisation	Nature of Representation	Summary
				a residential curtilage as part of a conversion proposal will not be permitted in areas of Outstanding Natural beauty where this would be harmful to the character of those areas" needs to be added.
DM250	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	Objection to description of VSC's Objection to 75% of existing structure being maintained.
DM464	South East Water	Adams Hendry	Object to the approach or wording	Notes that the DPD only includes draft Policy GB1 dealing with the re-use of buildings in the Green Belt, which makes no reference to the development of new buildings
DM79	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach	Support
DM225	Brenda Hambrook	Otford Parish Council	Support the approach	Would like to be fully involved in all discussions throughout the consultation period and in any development of future planning policy in this regard.
DM368	Paul Crick	Environment and Planning Division Kent County Council	Support the approach	Considers that Policy GB1 provides sufficient control to ensure development respects and protects the District's Green Belt.
DM471	F Marshall	The Sevenoaks Society	Support the approach	Support principle of GB. Do not agree in commercial re-use being prioritised above residential. Notice lack of reference to other key designations
DM485	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach	Support but Policy GB3B should be added to the list of Local Plan policies to be replaced by this policy in accordance with Appendix 2.
DM95	Alison de Jager	Ash-cum-Ridley Parish Council	Support the approach subject to changes	The Policy provides sufficient control but may encourage retention of semi-derelict buildings that would be better substantially improved or replaced
DM117	Tracy Godden	Clerk Dunton Green Parish Council	Support the approach subject to changes	It may encourage retention of semi-derelict buildings that would be better substantially improved or replaced. This policy may be too restrictive and, rather than retaining the character of the area, will result in derelict buildings harming the character of the area.
DM258	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Leisure or community activities that do not alter the external appearance should be considered ahead of residential. Priority given to conversion to agricultural use to prevent speculative building for non-viable uses.

Ref No	Name	Organisation	Nature of Representation	Summary
				<p>Permission should be subject to boundary treatments not affecting the openness of the Green Belt.</p> <p>Traffic and traffic movements must be taken into account for re-use.</p> <p>Proliferation of such conversions that cause increased density should also be taken into account.</p> <p>It is necessary for the developer to demonstrate that likely traffic movement and size of vehicles from business use is appropriate to the local roads and area.</p>
DM290	J.L Phillips	Tandridge District Council	Support the approach subject to changes	Proposing that least 75% of the original structure be maintained to protect its rural character may not be workable in practice. Given the draft NPPF stance the 75% figure for rebuilding may no longer be appropriate. Notwithstanding these comments, This limit should help to ensure that such development does not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks District boundary.
DM316	Adrian Standing	Ark Projects Limited	Support the approach subject to changes	Criteria of saved Policy EP13 should be incorporated within the proposed Green Belt SPD.
DM391	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	This policy is also applicable to buildings within the AONB
DM484	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	The first and second sentences should be re-worded as follows: “National and local policies controlling development in the countryside apply with equal force in the Green Belt. However, there is a strong presumption against development within the Green Belt, and it will only be accepted in very exceptional circumstances.”
<u>Minor Green Belt Boundary Amendments</u>				
DM106	Christina Wilton	Brasted Parish Council	Object to the approach or wording	The phrase "where land no longer contributes to the Green Belt" is dangerously loose.
DM118	Tracy Godden	Clerk Dunton Green Parish Council	Object to the approach or wording	Under what circumstances would land be deemed to 'no longer contribute to the Green Belt? Land becoming derelict is indicated as not being sufficient reason
DM35	Alice de la Rue		Object to the approach or wording	Are not aware that there have ever been any amendments to the Green Belt boundary to accommodate sites for Gypsies or Travellers in any part of the country, yet there have been many such alterations to accommodate mainstream housing

Ref No	Name	Organisation	Nature of Representation	Summary
DM412	Janice Butler	Leigh Parish Council	Support the approach	Ensure Sevenoaks District Council's procedures for amendments facilitate consultation with the Parish Councils and neighbours.
DM19	Thomas Rand		Support the approach	In some cases the GB is over protected as in the case of small plots adjoining boundaries. Minor adjustment to the Boundaries would encourage land owners to enhance and recycle derelict land.
DM30	Leslie Robis		Support the approach subject to changes	<p>There remains a real need for housing in particular Social Housing and purpose built Retirement Homes</p> <p>In Swanley/Hextable there are 2 sites which if developed would improve the street scene not affect the Green Belt and if designated for local need, provide much needed local housing. These sites are old now defunct nursery land.</p> <p>Corner of New Barn Road and Swanley Lane at Five Wents. It would not affect the green wedge separating Hextable from Swanley and would clean up the boundary of residential land. Development would not form a precedents as the two sites are not surrounded by green belt or agricultural land. If developed would form an integral part of the local community, particularly if developed specifically for defined local need including a much needed health clinic.</p>
DM31	Leslie Robis		Support the approach subject to changes	<p>There remains a real need for Social Housing and purpose built Retirement Homes.</p> <p>In Swanley/Hextable there are 2 sites which if developed would improve the street scene not affect the Green Belt and if designated for local need, provide much needed local housing. These sites are old now defunct nursery land.</p> <p>College Road, Hextable following severe damage to glasshouses this is no longer viable. It could be incorporated into the village envelope with the new boundary separating it from industrial land. Development would not form a precedent as the two sites are not surrounded by green belt or agricultural land. If developed would form an integral part of the local community, particularly if developed specifically for defined local need including a much needed health clinic.</p>
DM42	John Sparrow	Matthew Blythin DHA Planning	Support the approach subject to changes	Propose a minor amendment to the boundary south of Parkfield on the Wildernesse Estate, Sevenoaks, to form a straight line along the boundary of the golf course.
DM103	Mark Batchelor	Robinson Escott Planning	Support the approach subject to changes	Minor Amendment to Halstead Village to embrace Deer Leap Stud Farm, all the buildings within Warren Court as well as Warren Court Farmhouse.
DM105	Sawyers Park	Mark Batchelor	Support the approach	Minor Boundary Amendment of West Kingsdown to include "The Bungalow, London Road, West

Ref No	Name	Organisation	Nature of Representation	Summary
	Homes	Robinson Escott Planning	subject to changes	Kingsdown".
DM182	Mr A Lee and Ms Ackleton		Support the approach subject to changes	<p>Fiveways Nursery (North) and Fiveways Nursery (South) Swanley Lane, Swanley (1.19 hectares)</p> <p>The pattern of development across this site is more closely related to the pattern of development in the adjacent settlement of Swanley than in the land beyond the site boundaries that is predominantly open. The uses and activity within the site has a functional relationship to the settlement because all access into and out of the site takes place through the settlement of Swanley.</p> <p>A substantial gap of open land will remain that will separate Hextable from the edge of Swanley and prevent neighbouring settlements from merging into one another.</p> <p>This area of land no longer fulfils the fundamental aim of the Green Belt that is to retain the openness of land because it is already built up. The Inspector in his report into the Sevenoaks District Local Plan recommended that the Green Belt boundary should be redefined as suggested in this representation. However, at the time the Inspectors decisions were not mandatory and SDC decided not to accept the recommendation.</p>
DM216	P Brazier		Support the approach subject to changes	<p>Land north of New Barn Road, Swanley. It is bounded by New Barn Road to the north, New Barn Park to the west, and a derelict Nursery and housing development to the east and south. It is for the most part undeveloped with buildings contained to the northern end of Veitchii Nursery comprising a detached cottage and range of buildings in employment use. The undeveloped part of the site is not in productive use and suffers from fly tipping and unauthorised access to the detriment of the visual amenities of the area.</p> <p>The proposal is to utilise the site as a crematorium, garden of remembrance and extension to New Barn Park. There is an under provision of burial space and gardens of remembrance in the Swanley area, and there is a growing requirement locally for a crematorium. The proposal would meet a local need and is situated in a sustainable location thereby reducing the need to travel. The extension to New Barn Park would augment a popular community facility and would bring into public control a significant area of land between Swanley and Hextable. With careful consideration to the access design, massing and location of a crematorium together with associated landscaping, it is contended the 'green wedge' between the Swanley and Hextable would be preserved. The local need and provision of public open space would amount to very special circumstances for the allocation of the uses in the LDF, in an area otherwise designated as Green Belt.</p>
DM282	Barbara Ayres		Support the approach	Hextable Parish Council Complex . The small piece of land lies right on the edge of the Green Belt and

Ref No	Name	Organisation	Nature of Representation	Summary
			subject to changes	is completely surrounded by development, with Crawfords on one side and the parish complex on the other sides, which is not needed and not used. This area could accommodate a small detached house 'completing the close' 3 options proposed Take site from the GB. Take the parish complex site containing the development out of Green Belt. Leave all the site in GB including the small plot and submit a planning application for a residential unit.
DM183	M Johnson		Support the approach subject to changes	Hextable Development across this site is more closely related to the pattern of development in the adjacent settlement of Hextable than in the land beyond the site boundaries that is predominantly open. The uses and activity within the site has a functional relationship to the settlement because all access into and out of the site takes place through the settlement of Hextable. A significant part of the site should now be regarded as previously developed land "Brown Field land. A substantial gap of open land will remain that will separate Hextable from the edge of Swanley and prevent neighbouring settlements from merging into one another. This area of land no longer fulfils the fundamental aim of the Green Belt that is to retain the openness of land because it is already built up. It is also apparent that there are community lead needs for development e.g. new medical centre and sheltered housing that cannot be met within the existing confines of the settlement of Hextable. The release of this land from the Green Belt would provide for these development needs to be met without having to rely upon very special circumstances.
DM285	Tracy Lane	Parish Clerk Hextable Parish Council	Support the approach subject to changes	Minor amendment at Hextable Parish Council.
DM147 DM236	Cllr John Edwards-Winser Brenda Hambrook	Oxford Parish Council	Support the approach subject to changes	Oxford Parish Council is planning to improve its car parking facilities and may wish to seek a Minor Green Belt Amendment in order to introduce a Green car park area on the village's Southern boundary.
DM317	Mr and Mrs K Vizard	Adrian Standing Ark Projects Ltd	Support the approach subject to changes	Minor Boundary Amendments Bartram Farm Estate Old Oxford Road Sevenoaks
DM318	Brian Chandler	Adrian Standing Ark Projects Ltd	Support the approach subject to changes	Minor Amendments College Road Nurseries College Road Hextable
DM319	P Cruickshank	Adrian Standing	Support the approach	Minor Boundary Amendments Land at Park Lane Kemsing

Ref No	Name	Organisation	Nature of Representation	Summary
		Ark Projects Ltd	subject to changes	
DM47	J Hoad	Hartley Parish Council	Support the approach subject to changes	The GB boundary at Billings Hill Shaw, Hartley, should be amended as agreed in the previous SDLP.
DM102	Clark's College Ltd	Mark Batchelor Robinson Escott Planning	Support the approach subject to changes	Request for a small scale boundary amendment at Southdown House, High Street, Brasted as the land does not contribute to the purposes of the Green Belt and the boundary cut across curtilages.
<u>Major Developed Site Boundaries</u>				
DM486	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach	If proposals are put forward, there should be a further round of targeted consultation with interested stakeholders before a decision is made on them. This should include Parish Councils, and CPRE.
DM333	Armstrong (Kent) LLP	Christopher Hill GVA Grimley	Support the approach subject to changes	Promoting amendment to Fort Halstead MDS boundary.
<u>Promoting Land for Housing</u>				
DM226	Brenda Hambrook	Oxford Parish Council	Object to the approach or wording	Concern over the effect of additional housing on small communities. Add criterion that any application for a new site development clearly establish that its effect will not be to detrimental to the sustainability of the local community.
DM276	Cooper Estates Limited	Robin Buchanan	Object to the approach or wording	Supports the approach (of the DPD) subject to changes' as follows: (a) That the site be included as a new housing allocation in the merged Allocations and Development Management DPD. (b) That the second bullet point parameter in the table at para 5.1 of the DPD be amended as follows: "The site is located within the confines of an existing built settlement or on the edge of a built up settlement and not within the green Belt". There are only very limited locations that could satisfy both the 'or' provision and the 'and' provision.
DM311	Cooper Estates	Paul Watson Phillips Planning Services	Object to the approach or wording	Promotion of safeguarded land, early release proposed.

Ref No	Name	Organisation	Nature of Representation	Summary
DM104	Mark Batchelor	Robinson Escott Planning	Support the approach	Allocation of land to the west of no.5 Mill Lane, Shoreham for housing. Already submitted during the Allocation (Options) consultation.
DM34	Leigh Family	Carter Planning Limited	Support the approach subject to changes	Leighs Yard and Shefts Croft, Mill Hill, Edenbridge should be considered for residential development.
DM307	United House	Planning Potential Ltd	Support the approach subject to changes	Continued promotion of United House for housing allocation
DM334	Armstrong (Kent) LLP	Christopher Hill GVA Grimley	Support the approach subject to changes	Support of Fort Halstead as a mixed use housing led allocation.
DM392	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Housing and residential development The AONBs should be mentioned in this chapter. Para 5.1 Add'enabling the GB and the AONBs to continue to be protected' Promoting Land for Housing Wherever Green Belt is mentioned AONB could also be added. AONB is not exempt from receiving planning applications! Therefore add to bullet point 2: '..... and not within the GB or the AONB'
DM404	Helen Milner	Network Rail	Support the approach subject to changes	Promotion of Station Road Edenbridge
Policy H1 Residential Conversions				
DM251	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	Objection to criteria a) being too restrictive.
DM20 DM80 DM119 DM293	Thomas Rand Christine Lane Tracy Godden J.L Phillips	Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council Tandridge D Cl	Support the approach	Support
DM53	Trevor R Hall	Developer Contributions Manager Kent	Support the approach subject to changes	Conversion of residential properties in to apartments usually leads to more vehicles being parked on the highway, the highway often already being congested. This impacts on emergency services responses to premises in the vicinity.

Ref No	Name	Organisation	Nature of Representation	Summary
		Police		Recommends a further criterion: 'The proposal not increasing traffic congestion and on street vehicle parking in the vicinity'
DM149	Cllr John Edwards-Winser		Support the approach subject to changes	Might be difficult to prove if the development will produce a materially greater impact on the openness of the Green Belt compared with what it is replacing. ANY application for a new development clearly establishes that its effect will not be detrimental to the sustainability of the local community
DM345	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	Point 5.4 should be amended to cover not just apartments, but developments where dwellings are split vertically. ie the successful redevelopment of the RUC hall in Hollybush Lane
DM393	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	This policy should also cover the AONBs
DM413	Janice Butler	Leigh Parish Council	Support the approach subject to changes	Add 'or significantly increase traffic flow along country lanes or roads without pavements'
DM488	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Consider that reference to flood risk should be specifically included in the Policy. Also, for clarity, reference to policies SC1, SC2 and SC3 should be included.

Policy H2 Limited Extensions or Outbuildings to Existing Dwellings in the Green Belt

DM37	Mike Tatham	Tatham Homes Ltd	Object to the approach or wording	Each application should be treated on its merits and on its design to decide if it was an acceptable development in the green belt. Some schemes meet the proposed criteria but are not acceptable and vice versa. Basements that are below ground level should not be included in the volume or area calculation as they have no bearing on the visual bulk of the building and cannot possibly impact on the green belt. If there is a restriction it should be the method currently used based on floor areas. Volumes can distort the proposed designs with acceptable volumes in planning terms for instance, the incorporation of a flat roof extensions that may be out of character to the existing.
DM44	Christopher Drake	Assistant Town Clerk Swanley Town Council	Object to the approach or wording	Objects to the reduction in the total volume of extensions or outbuildings to existing dwellings in the Green Belt, from 50% to 30%

Ref No	Name	Organisation	Nature of Representation	Summary
DM132	Gillian King Scott	Clerk Halstead Parish Council	Object to the approach or wording	30% Volume more complicated to calculate than 50% floor-space. Does this include non-habitable roof spaces?
DM186	Graham Simpkin	Graham Simpkin Planning	Object to the approach or wording	<p>The base line for consideration of an Original dwelling is 1948 when aspirations were very different from today, by restricting increases to 30% of what existed in 1948 there is a danger that it is merely perpetuating the social inequalities.</p> <p>The volume calculation based on such a distant date will add to arguments between the Council and applicants and appeals. The choice of volume is a retrograde step. If volume is used the horizon date or base date for the operation of the Policy should be much more recent e.g. 2000 from which time it will be possible to use reliable sources to determine volume that existed at that date by use of modern aerial photography, better quality sources of information. If not then it is appropriate to retain floor space as the basis on which calculations should be made.</p> <p>The Policy should be related to what can be undertaken using Permitted Development Rights that have been changed recently. It is likely that this Policy will offer less than can be built using Permitted Development Rights. The Government makes no distinction between development in Green Belt areas and those elsewhere (apart from certain protected areas) for the use of Permitted Development Rights.</p> <p>It is also noted that the GPDO has moved away from volume limits to specific criteria and therefore the proposed DPD Policy H2 seems to be going in the opposite direction.</p>
DM194	Lynda Harrison	West Kingsdown Parish Council	Object to the approach or wording	<p>Proposed policy H2 is not a replacement for existing policy H14B which relates to outbuildings in the AONB. There should be a new policy covering the criteria contained in H14B, i.e. the total gross floor area of 40sqm, the building being single storey, the 30% increase in volume, design and siting and the fact that outbuildings will not be permitted within the curtilages of buildings converted to dwellings.</p> <p>The change from 50% floor space to 30% volume could be a positive approach provided some height restriction is introduced . There is no case for allowing proportionalley larger extensions to smaller properties. Smaller dwellings provide accommodation for those of lesser means. The policy also helps to protect the countryside from the urbanising effect of increasing numbers of large properties.</p>
DM213	Y Tredoux	Kemsing Parish Council	Object to the approach or wording	The volume-based figure of 30%, is likely to create applications for extensions upwards, resulting in applications for 3 storey dwellings, which could be injurious to the street scene and create additional overlooking of neighbouring properties to the detriment of the amenity of the residents.

Ref No	Name	Organisation	Nature of Representation	Summary
DM227	Brenda Hambrook	Oxford Parish Council	Object to the approach or wording	Recommend retention of the 50% rule. Proportionately larger extensions to smaller properties should only be allowed when there is proven justifiable need.
DM245	James Tagg		Object to the approach or wording	Objections - on Environmental Grounds - shortage of housing accommodation (often done by relaxing Greenbelt restrictions) on Socioeconomic Grounds- The scheme will reduce the increase in habitable area within the countryside. on Design and Heritage Grounds.- The proposal will result in building schemes that maximize the utility of the space within the new restrictions. If read without mathematical knowledge it implies that a 50% volume limit would be considerably larger than a 50% floor area limit and so the 30% volume is a more appropriate balance.
DM263	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	Policy text should reflect text contained in GPDO with regards to ancillary uses; PPG2 allows the limited extension of dwellings in the Green Belt and should not be subject to individuals circumstances; Cannot identify any valid reason why the current policy should be changed. Basements don't impact upon GB openness the reference should be deleted.
DM295	Hobson		Object to the approach or wording	It would be beneficial for small houses to be allowed a greater scope. Suggest adding to clause b) at end of sentence "or exceed 120 m3, whichever is the larger"
DM346	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	A reduction from 50% to 30% floorspace allowance is too drastic and would prefer to see higher percentage allowed. There is a case for allowing proportionately larger extensions to smaller properties when properties are under the 1200-1400sq ft size range.
DM414	Janice Butler	Leigh Parish Council	Object to the approach or wording	Unsure of rationale behind suggestion of 30% of original volume and therefore suggest 50% of volume is retained, particularly in relation to smaller dwellings.
DM436	Angela Howells	Clerk Westerham Parish Council	Object to the approach or wording	Seeks confirmation of detailed interpretations.
DM453	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	Find it difficult if not impossible to assess applications using these criteria. Clarification is needed as to whether the proximity of outbuildings as well as whether things like tennis courts and swimming pools would count in the calculations.

Ref No	Name	Organisation	Nature of Representation	Summary
DM473	L Moss	Fawkham Parish Council	Object to the approach or wording	Detailed Objection to Policy H2.
DM287	Tracy Lane	Clerk Hextable Parish Council	Object to the approach or wording	Believe change in approach is confusing for some applicants. The 50% rule should be kept
DM489	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	<p>30% doesn't seem unreasonable, would prefer to see an approach that does not set limits. Refer to para 3.6 of PPG2 and the draft NPPF proposes to keep the same approach and same wording.</p> <p>The standard floor area or volume approach seeks to provide control and certainty by limiting the size of extensions, but makes it difficult to refuse anything that is at the absolute limit people inevitably will push to the limits of what they are allowed.</p> <p>There is also the issue of permitted development rights, and how (and if) this is taken into account. Whilst proposed Policy H2 in regard to extensions explicitly says that the 30% volume figure includes any previous extensions and outbuildings, what is the situation where the original house has not had any extensions and is in its original form? If the owner achieves permission for a 30% increase will the Council automatically remove permitted development rights for any further extensions? This is an option the Council has and would be relatively straightforward in this clear cut situation, but it is more difficult if the owner only applies for a 20% extension. What would (can) the Council do about controlling permitted development rights in this instance to ensure only 30% overall? It makes for a rather complicated, and potentially confrontational, approach.</p> <p>The policies should not actually set any size limit but each case should be considered on its merits against the general advice of PPG2/the NPPF – that extensions do not result in 'disproportionate additions' and that replacements are not 'materially larger'. This wording should be included in the policy (or at least the supporting text), whilst the other proposed criteria would remain relevant (and perhaps could be added to). This will enable the Council to consider each proposal individually and, where considered appropriate, not accept even a 30% increase.</p>
DM214	Y Tredoux	Kemsing Parish Council	Support the approach	Agree that there is a case for allowing proportionately larger extensions to smaller properties.
DM151	Cllr John Edwards-Winser		Support the approach	<p>Volume is a lot easier to consider than area. Should there be a cut-off date included? ie 30% volume at the date built or as at 1947.</p> <p>No reason for proportionately larger extensions for smaller properties unless there is proven justifiable need ie dialysis equipment</p>
DM294	J.L Phillips	Tandridge D C	Support the approach	Support

Ref No	Name	Organisation	Nature of Representation	Summary
DM21	Thomas Rand		Support the approach subject to changes	The extensions allowed should be the same for every property
DM81	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	Concern over the case for including basements, suggest if they don't have separate entrances and are no habitable space they should not be included.
DM96	Alison de Jager	Ash-cum-Ridley Parish Council	Support the approach subject to changes	There is a case for allowing proportionally larger extensions to smaller properties, but for larger properties, the maximum extension should be less than 30%.
DM107	Christina Wilton	Brasted Parish Council	Support the approach subject to changes	Changing from floorspace to volume will make calculations more difficult. Introduce a reducing sliding scale according to the original size of the property, possibly starting at a higher percentage.
DM260	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Do all outbuildings count in the calculation? Serious concerns that PCs will find it difficult to assess applications.
DM358	Andrew Michaelides		Support the approach subject to changes	Support the change to the policy- will be better at capturing the real impact of extensions in comparison to the existing 50% floorspace limit. Believe the existing limit on outbuildings for dwellings in the Green Belt of 40 square metres should be retained.
DM425	Lorna Talbot	Clerk Seal Parish Council	Support the approach subject to changes	The Parish Council believes that the existing Local Plan Policy H14B (2) which limits the size of outbuildings to 40 square metres should be retained. The proposed change contained in Policy H2 could result in large buildings in the open countryside, up to 30% of the volume of an existing house, which could be substantial.
<u>Policy H3 Replacement Dwellings in the Green Belt</u>				
DM38	Mike Tatham	Tatham Homes Ltd	Object to the approach or wording	<p>Each application should be treated on its merits and on its design to decide if it was an acceptable development in the green belt. Some schemes meet the proposed criteria but are not acceptable and vice versa.</p> <p>Basements that are below ground level should not be included in the volume or area calculation as they have no bearing on the visual bulk of the building and cannot possibly impact on the green belt.</p> <p>If there is a restriction it should be the method currently used based on floor areas. Volumes can distort the proposed designs with acceptable volumes in planning terms for instance, the incorporation of a flat roof extensions that may be out of character to the existing.</p>
DM101	Timothy Ball	JHD Architects	Object to the approach or	Proposed changes will reduce potential for well designed and energy efficient dwellings. The policy

Ref No	Name	Organisation	Nature of Representation	Summary
			wording	should be more flexible to allow good design, percentage will result in some schemes that are too large and others rejected. Change to volume may affect good architecture, non habitable basement areas should not be included. Suggest using gross internal floor area instead as this directly relates to the occupancy of both the existing and replacement house.
DM133	Gillian King Scott	Clerk Halstead Parish Council	Object to the approach or wording	30% Volume more complicated to calculate than 50% floor-space. Does this include non-habitable roof spaces?
DM190	Graham Simpkin	Graham Simpkin Planning	Object to the approach or wording	Difficulties will arise for calculating historic volumes dating back to 1948. Basements wholly underground have no bearing upon “openness” of the Green Belt and therefore should be excluded from calculations relating to volume. Should refer to circumstances where it is proposed to replace a dwelling that has already been extended in excess of the new policy i.e. where it has been extended by the previous Policy allowance of 50%. The policy should therefore state categorically that replacements on a like for like basis where the parameters of the policy are already exceeded will be acceptable.
DM273	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	Para 5.21 seems to suggest that dwellings in the Green Belt can only be replaced if the existing house is at the end of its useful life.
DM297	Hobson		Object to the approach or wording	Beneficial to Green Belt communities to be allowed a greater scope. Suggest adding to clause b) at end of sentence "or exceed 120 m ³ , whichever is the larger"
DM454	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	Policy H3 - First sentence should end '...are met.' Same requirements regarding the 30% rule apply. Any alternative site on the plot should be no more detrimental to the Green Belt than the existing building and preferably less detrimental.
DM490	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	See summary for DM489

Ref No	Name	Organisation	Nature of Representation	Summary
DM22	Thomas Rand	Town Clerk Edenbridge Town Council	Support the approach	Support
DM82	Christine Lane	Ash-cum-Ridley Parish Council		
DM97	Alison de Jager	Clerk Dunton Green Parish Council		
DM120	Tracy Godden	Tandridge D C		
DM296	J.L Phillips			
DM54	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	Much of the highway within Green Belt comprises narrow lanes, etc. emergency vehicles may encounter obstructions delaying attendance. Recommends the inclusion of an additional criterion: 'The proposal does not increase traffic congestion and on street vehicle parking in the vicinity'.
DM153	Cllr John Edwards-Winser		Support the approach subject to changes	(d) should be regarded sympathetically if it is a self-build. The change from 50% area to 30% volume is positive as it is easier to assess
DM196	Lynda Harrison	Clerk West Kingsdown Parish Council	Support the approach subject to changes	There needs to be a paragraph explaining the meaning of " original ",The change 50% floor space to 30% volume could be a positive approach some height restriction is introduced into it. The word "consider" should be removed from the penultimate paragraph of policy H3
DM261	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Same comments as for Policy H2. "are met" instead of "is met". Any alternative site on the plot should be no more detrimental to the Green Belt than the existing building and preferably less detrimental.
DM394	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Para 5.11 This paragraph should relate to GBs and AONBs HS2 should be amended to relate to the AONBs. These are issues common to GB and AONBs
DM395	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Para 5.21 This applies equally to AONBs These are issues common to GB and AONBs
DM397	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Should apply also the AONBs.
DM437	Angela Howells	Clerk Westerham Parish Council	Support the approach subject to changes	Concerns - requires confirmation of no greater impact as a result of changes.

Ref No	Name	Organisation	Nature of Representation	Summary
<u>Policy H4 Re – Use and Protection of Existing Housing Stock</u>				
DM252	Simon McFarlane	Planning Issues	Object to the approach or wording	Additional wording is required to ensure that redevelopment that leads to a net increase in housing is permitted provided it meets with other policy objectives.
DM274	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	Policy H4 relates to "residential housing". If it is housing it must be residential so more careful wording is required.
DM23 DM55 DM83 DM98 DM121 DM162 DM347	Thomas Rand Trevor R Hall Christine Lane Alison de Jager Tracy Godden Cllr John Edwards-Winser Hugh D'Alton	Developer Contributions Manager Kent Police Town Clerk Edenbridge Town Council Ash-cum-Ridley Parish Council Clerk Dunton Green Parish Council Sevenoaks Town Council	Support the approach	Support y
<u>Policy H5 New Residential Care Homes</u>				
DM7	McCarthy and Stone Retirement Lifestyles Ltd	The Planning Bureau Ltd	Object to the approach or wording	<p>The background research guiding the emerging policies makes it very clear that the District will experience a very significant ageing of the population with the over 65s representing a much greater proportion of the total.</p> <p>Therefore there should be greater emphasis whether within Policy H5 or a separate policy to actively support housing for the older population. There are different ways in which the potential older population will wish to be housed and not just within traditional family Houses or care homes. An holistic approach should be taken in policy terms to ensure that there is a more positive approach to the likes of Owner Occupied Retirement Housing.</p>

Ref No	Name	Organisation	Nature of Representation	Summary
DM24	Thomas Rand		Object to the approach or wording	Criterion a) should only say with good access to public transport services and community facilities There should be a policy on warden controlled homes. The policy should allow for more use of disused nurseries sites in the Green Belt for warden controlled homes
DM259	Simon McFarlane	Planner Planning Issues	Object to the approach or wording	Policy should be widened to include all forms of specialist accommodation specifically including C3 residential Category II Sheltered Housing.
DM283	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	Criterion (b) of the policy refers to "defensible amenity space" but it is unclear what this means.
DM312	Cooper Estates	Phillips Planning Services	Object to the approach or wording	Taken a negative slant.
DM163	Cllr John Edwards-Winser		Support the approach	Support
DM33	Leigh Family	Carter Planning Limited	Support the approach subject to changes	Reference to the need to control the concentration of residential institutional accommodation to protect the character of an area could be interpreted too rigidly and should not be based purely on proximity. For example sites could be adjacent but with access onto different roads, therefore there is unlikely to be cumulative adverse impact
DM84	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	How will undue noise and disturbance' be judged? Residential units by their nature tend to be fairly large and could therefore always be seen as causing undue noise and disturbance. If may be necessary for a policy on C2a institutions to be considered to ensure security issues have been addressed.
DM198	Lynda Harrison	Clerk West Kingsdown Parish Council	Support the approach subject to changes	To prevent future changes of use that, whilst still under C2, could result in noise and disturbance to surrounding residents, a further criteria should be applied to policy H5, that restricts planning permission to that shown on the application
DM264	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	The 30% rule should apply here too.
<u>Policy H6 Siting of Caravan and Mobile Homes</u>				
DM25	Thomas Rand		Object to the approach or wording	Add "Mobile homes and caravans will only be allowed for the duration for new build and should be removed on the completion of any build"

Ref No	Name	Organisation	Nature of Representation	Summary
DM99	Alison de Jager	Ash-cum-Ridley Parish Council	Object to the approach or wording	The policy does not provide sufficient criteria to control mobile home development, there is no justification for using this policy for any permanent consent and should be restricted to temporary consent. Applications for permanent location should be dealt with through a planning application adhering to local planning policy. The Criteria regarding mobile homes should be more defined and the policy limited to temporary permission as in 5.39.
DM164 DM228	Cllr John Edwards-Winser Brenda Hambrook	Oxford Parish Council	Object to the approach or wording	Include the following Only be a temporary residence on site for limited/seasonal agricultural use. To prevent any farmer to open a caravan park on his field all year. They should be inconspicuously sited as much as possible within the landscape.
DM199	Lynda Harrison	Clerk West Kingsdown Parish Council	Object to the approach or wording	Does not provide sufficient criteria to control mobile home development. In order to provide proper control the wording of policies H19, H17 and H16 of the SDLP should be included as criteria under new policy H6.
DM265	Holly Ivaldi	Clerk Eynsford Parish Council	Object to the approach or wording	Policy too restrictive. Non-residential leisure caravans should be allowed for. There should be a time limit for completion of construction associated with a temporary caravan
DM284	Robinson Escott	Mark Batchelor Robinson Escott	Object to the approach or wording	There is no cross-reference to the annex to PPS7. In relation to criterion (a), feel that the policy should also include reference to equestrian activities.
DM396	Jennifer Bate	Kent Downs AONB	Object to the approach or wording	This applies equally to AONBs These are issues common to GB and AONBs
DM415	Janice Butler	Leigh Parish Council	Object to the approach or wording	Incorporate point from paragraph 5.35 above about subsequent changed use leading to detrimental impact on local surrounding.
DM455	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	Policy H5 - The 30% rule should apply here too. Para 5.39 - There should be a time limit for completion of construction associated with a temporary caravan. Policy H6 - This would appear to prevent you parking a leisure caravan, not used for residential purposes, on your driveway.

Ref No	Name	Organisation	Nature of Representation	Summary
DM85 DM122	Christine Lane Tracy Godden	Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council	Support the approach	Support
DM430	Jennifer Wilson	Environmental Agency	Support the approach subject to changes	It should be made clear mobile homes are classed as 'Highly Vulnerable' and will not be permitted in flood risk areas.
DM438	Angela Howells	Clerk Parish Council Westerham	Support the approach subject to changes	a) Once a caravan or mobile home has been granted permission in the Green Belt. Seek regular checks that there is a continuing need for this and that there is a viable agricultural or forestry activity actually taking place on this site.
DM491	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Within criterion a) there needs to be reference to the removal of a mobile home/caravan when the need for it has gone. This should also be addressed in paragraph 5.38.

Promoting Land for Gypsy and Traveller and Travelling Show People Accommodation

DM26	Thomas Rand		Object to the approach or wording	No more Gypsies because we already have enough legal and illegal sites in the Sevenoaks District
DM36	Alice de la Rue		Object to the approach or wording	Whilst national planning policy on Gypsy and Traveller accommodation is currently under review, this should not be an opportunity for further delay of appropriate provision of accommodation. The facts have not changed in that there is a shortage of this specialist accommodation type. It would be sensible to adopt the pitch targets in the Partial Review and turn the focus to delivery, an approach supported by current and emerging national planning policy. Support cross-boundary working, but this should not be seen as an opportunity to delay progress, and should not be used as an excuse by a local authority to try to avoid making appropriate provision in their area.
DM134	Gillian King Scott	Clerk Halstead Parish Council	Object to the approach or wording	The paragraph inviting land owners to promote their land for gypsy and travellers sites will encourage landowners to sell to travellers and there will be large increase of sites within the Green Belt.
DM456	Naomi Wolfe	Eynsford Parish	Object to the approach or	Any development in the Green Belt should be subject to the same rules as for anybody else. There

Ref No	Name	Organisation	Nature of Representation	Summary
		Council	wording	should be no special treatment as this would be inequitable.
DM56 DM123	Trevor R Hall Tracy Godden	Developer Contributions Manager Kent Police Clerk Dunton Green Parish Council	Support the approach	Support
DM266	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Any development in the Green Belt should be subject to the same rules as for anybody else.
DM369	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Will provide some comfort to councils that Traveller sites really are recognised as inappropriate development in the Green Belt. Applications from Travellers for development in the GB should be dealt with in exactly the same way as applications from members of the settled community. Retrospective applications should not be treated any differently. This should be reflected in this document.
DM398	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	This applies equally to AONBs These are issues common to GB and AONBs The following should be added to the green box: Development of sites within the AONBs are considered inappropriate development.
DM439	Angela Howells	Clerk Westerham Parish Council	Support the approach subject to changes	Planning policy for gypsy and traveller sites should be the same as that for other forms of housing, in the interest of fairness and equality of treatment between travellers and others.
Policy T1 Mitigating Travel Impact				
DM494	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Object to the approach or wording	Disagree that this replaces Local Plan policies T8, T9 & T10. It is difficult to see how this can be as the Local Plan policies cover a different policy topic. It also conflicts with Appendix 2.
DM229 DM165	Brenda Hambrook Cllr John Edwards-Winser	Otford Parish Council	Object to the approach or wording	Amend wording of second Paragraph: From “This may mean..” to “This requires...” Does not have sufficient weight to mitigate travel impact. There must be a clear policy of promoting walkways and footpaths and the defined introduction of independent or combined cycle routes within the district.
DM158	John Lister	Natural England	Object to the approach or	Paragraph 6.2 makes reference to the health benefits of walking and cycling, however Policy T1 makes

Ref No	Name	Organisation	Nature of Representation	Summary
			wording	no reference to these modes
DM212	Derek Johnson	Clerk Chevening Parish Council	Object to the approach or wording	The proposals as drafted do not have sufficient weight or substance. A policy is needed to protect Air Quality, particularly from the extra traffic resulting from development.
DM457	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	There appears to be no consideration of traffic impact on quiet lanes and the unsuitability of certain commercial traffic movements.
DM86 DM124 DM308	Christine Lane Tracy Godden United House	Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council Planning Potential Ltd	Support the approach	Support Support proposal to improve links to Station.
DM39	John Henderson	NDD SE Planner Highways Agency	Support the approach subject to changes	Remove the words in brackets stating for 'non-residential purposes'. Include reference to the Draft and CLG Guidance on Transport Assessment.
DM57	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	Support policies which seek to minimise congestion. New transport infrastructure must have public safety 'designed in' and must adopt Secured by Design measures. Car parks must be compliant with the "Park Mark" standards.
DM267	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	There appears to be no consideration of traffic impact on quiet lanes and the unsuitability of certain commercial traffic movements.
DM348	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	Interested to see this being placed in the context of an integrated transport policy.
DM370	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	The term 'sustainable transport' should be included in the second sentence of Policy T1.
DM421	National Grid	Nathaniel Lichfield & Partners	Support the approach subject to changes	Suggested amendments see main rep

Ref No	Name	Organisation	Nature of Representation	Summary
DM492	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Support but it should additionally state that planning permission will be refused if acceptable mitigation is not achievable.
<u>Policy T2 Vehicle Parking</u>				
DM166 DM230	ClIr John Edwards-Winser Brenda Hambrook	Otford Parish Council	Object to the approach or wording	It presupposes that public transport IS available. The current allowance of one car per household is proven to be insufficient. Space must be allowed for 2-3 cars – together with additional ‘common use or visitor’ parking of 0.5 cars per household.
DM203	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	Reference to setting "maximum parking standards" should be reconsidered in the light of recent Government advice allowing a more flexible approach. PPS4 advises at policy EC8 (Car Parking for Non Residential Development) that properly adopted and justified policies should be provided within local development frameworks. It seems that where an advice provision takes the place of adopted standards for an interim period, a more detailed explanation of the basis for this advice should be set out within the policy.
DM205	Derek Johnson	Clerk Chevening Parish Council	Object to the approach or wording	SDC should formulate and use its own parking provision criteria instead of using those of Kent County Council, reflecting the greater emphasis on car usage in Sevenoaks.
DM349	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	Has very strong objections to this policy. KCC parking standards are often inadequate, like to see SDC create its own parking policy tailored to Sevenoaks.
DM440	Angela Howells	Clerk Westerham Parish Council	Object to the approach or wording	Westerham is particularly poorly served by public transport, so KCC interim vehicle parking standards may not always be appropriate for a new residential development.
DM458	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	Point (a) should not be restricted to just where there is good public transport. On-street parking can be a problem anywhere, and especially in rural villages. There should be minimum standards for rural villages and these should be fiercely defended.
DM87	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach	Adequate provision using the car parking associated with the development or conversion should be used where ever possible to protect the car parks and High Street parking.
DM125	Tracy Godden	Clerk Dunton	Support the approach	Support

Ref No	Name	Organisation	Nature of Representation	Summary
		Green Parish Council		
DM309	United House	Planning Potential Ltd	Support the approach	Welcome the flexibility that the Council may depart from established standards in order to allow for some relaxation in town centres or elsewhere if a site is well served by public transport.
DM493	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach	Support but do not consider that it replaces Local Plan policies VP10 & VP11 (and neither does Appendix 2).
DM2	Bob White	Kent Highway Services	Support the approach subject to changes	Explain the key difference between "destination" parking and "origin" parking and either remove the reference to maximum standards or indicated that while non-residential standards remain as maxima, the residential guidance IGN3 distinguishes between areas with parking controls and those without.
DM58	Trevor RHall	Developer Contributions Manager Kent Police	Support the approach subject to changes	In new developments sufficient off road parking should be provided, taking in to account average motor vehicle ownership/dwelling size, for residents and allowances made for visitors. Supports the proposal for utilising public car parks but they should meet the ACPO Park Mark criteria.
DM268	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Point (a) should not be restricted to just where there is good public transport. There should be minimum standards for rural villages and these should be fiercely defended.
DM371	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	It would be helpful if town centre approaches to parking were in the context of town centre parking strategies. The section on residential parking is consistent with recent Government announcements and the Transport White Paper.
DM416	Janice Butler	Leigh Parish Council	Support the approach subject to changes	Increased car parking spaces should be permitted adjacent to railway stations to encourage transfers from cars to rail.
<u>Policy GRN1 Green Infrastructure and New Development</u>				
DM27	Thomas Rand		Object to the approach or wording	Too much protection. Landscaping should be incorporated. Some development in Green Belt would be in accordance with CS policy L08.
DM160	John Lister	Natural England	Object to the approach or wording	It is unclear how development in BOAs will be managed, and in the event that development comes forward within these areas, how the local opportunities will be captured, and habitats created, improved and managed. It is unclear whether the BOAs will be shown on the proposals map and further policy guidance prepared to deal with these issues.

Ref No	Name	Organisation	Nature of Representation	Summary
DM331	Debbie Salmon	Kent Wildlife Trust	Object to the approach or wording	The Trust is concerned that there is no delivery and monitoring plan for the GI proposed within this document
DM350	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	Would prefer not to see tier 3 Councils denied the right to have an impact on this. Believe that a portion of all S106 agreement monies should go by right to Local Town and Parish Councils for the provision of green infrastructure.
DM372	Paul Crick	Environment and Planning Division Kent County Council	Object to the approach or wording	Detailed comments on GI Network .
DM459	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	There is no reference to Sites of Nature Conservation Interest or Local Nature Reserves Policy GRN1 - The word 'fully' should proceed 'mitigate'
DM159	John Lister	Natural England	Support the approach	Welcomed. However the context for making judgments under this policy is unclear. There is excellent work on GI in the countryside and there should be equivalent work in the urban and peri-urban areas.
DM9	Karen Jefferys		Support the approach	Planning permission should consider more closely the added pressures that new houses will bring in terms of parking, leisure facilities, transport etc and what the building companies will positively contribute- eg a new playground, extra parking, more trees. When requirements are made - eg to have greenery around a building- they also need to be enforceable.
DM88	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach	Support
DM126	Tracy Godden	Clerk Dunton Green Parish Council		
DM431	Jennifer Wilson	Environmental Agency		
DM167	Cllr John Edwards-Winser	Otford Parish Council	Support the approach	Support, providing the green infrastructures can be adequately located in each parish.
DM231	Brenda Hambrook			The 'GI' should be clearly established with local parishes and agreed in advance.

Ref No	Name	Organisation	Nature of Representation	Summary
DM136	Ruth Childs	High Weald AONB Unit	Support the approach subject to changes	Concerned with lack of AONB references and landscape features in CS. Support the reference to existing Green Infrastructure. Reference could be made to heritage GI features. Strongly support final paragraph, but not all GI should or will be accessible. The link between geology-landscape-habitats-biodiversity could be made clearer in supporting text. Heritage and landscape features can also form part of the GI network.
DM161	John Lister	Natural England	Support the approach subject to changes	The definition of GI components under para 7.3 , include predominantly urban features so consideration of GI through and around the key settlements would be appropriate. A clear and integrated overview of urban and rural GI provision would provide a robust context for making judgements under Policy GRN1, and for coming to a broader view on existing provision against changing needs.
DM177	Ruth Childs	High Weald AONB Unit	Support the approach subject to changes	Should recognise that the High Weald provides a wealth of existing multifunctional GI across the southern part of Sevenoaks District.
DM178	Ruth Childs	High Weald AONB Unit	Support the approach subject to changes	Paragraph 7.2 should demonstrate understanding of landscapes as determinants for habitat types and therefore biodiversity within the district. The link between geology-landscape-habitats-biodiversity could be made clearer .
DM179	Ruth Childs	High Weald AONB Unit	Support the approach subject to changes	Paragraph 7.3 – should make it clear that heritage features and landscape features (character components) can also form part of the existing GI network. Heritage features may offer more robust GI (in terms of biodiversity and well-being) due to their longevity, e.g. hedgerows or banks and shaws along historic routeways
DM180	Ruth Childs	High Weald AONB Unit	Support the approach subject to changes	Concern over the lack of AONB references and landscape features in the referenced document (Core Strategy) and the existing green infrastructure Reference could be made heritage GI features such as hedgerows or thin woodland shaws along historic routeways and lanes. Potentially these features are more important.
DM181	Susan Pittman	(Sevenoaks Protect Kent))	Support the approach subject to changes	Suggest that the Kent Downs guidance documents - Landscape Design Handbook and Rural Streets and Lanes Design Handbook be added to the policy
DM269	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	The word 'fully' should proceed 'mitigate'. Should seek net gain for green infrastructure. Should also specifically address conservation of protected species, with absolutely no loss of habitat. There is no reference to Sites of Nature Conservation Interest or Local Nature Reserves, both of which deserve special attention.

Ref No	Name	Organisation	Nature of Representation	Summary
DM314	James Wickham	Chipstead Sailing Club	Support the approach subject to changes	Promoting inclusion of Chipstead Lake in the GI Network suggest that Policy GRN1 be amended by inserting an additional paragraph as follows: “Additionally, parts of the Green Infrastructure Network of open space, sporting or recreationally value, will be retained, as required by Core Strategy Policy SP10.”
DM325	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	<p>Recommend that the policy be strengthened by making the following changes.</p> <p>Development proposals will only be permitted where it has been demonstrated that any impact on the Green Infrastructure Network and the biodiversity of the surrounding area have been fully considered and integrated into the proposal and that biodiversity is enhanced and extended.</p> <p>All proposals must accord with Policy LO8 of the Core Strategy. Proposals must preserve existing Green Infrastructure and biodiversity features and enhance and where possible extend the Green Infrastructure Network and biodiversity. It must be demonstrated that the proposal includes measures or features that mitigate against any potential harm or loss and ensure net gains as a result of the development.</p> <p>New landscaping and habitat restoration and/or re-creation should be incorporated as an integral part of new developments, in accordance with the principles contained in the Kent Design Guide and the Countryside Assessment SPD.</p> <p>Any open spaces provided as part of new development, must, wherever practicable, be located where they can provide a safe connection, with the existing features of the Green Infrastructure Network and provide connectivity for the population and biodiversity.</p>
DM373	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	<p>The principles of this policy in enabling the protection of GI are supported. However it could contain a vision for the future GI Network of the District, detailing areas of impoverished GI, or aspects of the multiple use of GI that need improvement in particular areas. This will help to focus and deliver the policy in order to “...where possible enhance the Green Infrastructure and biodiversity...”</p> <p>The first paragraph should be amended to: “Development proposals will only be permitted where it has been demonstrated that any impact on the Green Infrastructure Network and the biodiversity of the surrounding area have been fully considered and appropriate measures to avoid, mitigate and/or compensate for impacts have been integrated into the proposal.”</p> <p>It is unclear what is meant by the requirement to provide a “safe connection” between new open spaces and existing GI features.</p>

Ref No	Name	Organisation	Nature of Representation	Summary
DM399	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	<p>Para 7.2 Add ‘National Policy and CS policy LO8 ensure that designated landscape areas will be conserved and enhanced and recognises that small scale development within the AONBs can support the rural economy, provide space for informal recreation and support the Green Infrastructure.</p> <p>Para 7.3 (Accessible countryside includes the AONBs) Add ‘ the Kent Downs Landscape Design Handbook’ i.e. ‘New landscaping should be incorporated as an integral part of new developments, in accordance with the principles contained in the Kent Design Guide and the Countryside Assessment SPD and Kent Downs Landscape Design Handbook.’</p>
DM422	National Grid	Nathaniel Lichfield & Partners	Support the approach subject to changes	<p>“Development proposals will only be permitted where it has been demonstrated that any impact on the Green Infrastructure Network and the biodiversity of the surrounding area have been fully considered and where appropriate integrated into the proposal..... Proposals must preserve existing Green Infrastructure and biodiversity features where possible and should include measures or features that mitigate against any potential harm of loss.”</p> <p>The revised wording allows for a proper assessment on a site by site basis in respect of green infrastructure.</p>
DM495	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Should recognise the role of roadside verges as part of the green infrastructure.
<u>Open Space Provision</u>				
DM288	Tracy Lane	Parish Clerk Hextable Parish Council	Support the approach	Promotion of open space adjacent to St Peters Church and the Village Green.
DM326	Debbie Salmon	Kent Wildlife Trust	Support the approach	Support
DM168 DM235	Cllr John Edwards-Winsor Brenda Hambrook	Otford Parish Council	Support the approach subject to changes	Requires a list of open space land identified under policy EN9 of the Saved Local Plan, before a response for a full list of Open Spaces that require protection can be made

Ref No	Name	Organisation	Nature of Representation	Summary
DM315	James Wickham	Chipstead Sailing Club	Support the approach subject to changes	Suggests that lakes and open water be added to the list of types of open space in paragraph 7.12 The water at Longford Lake and adjacent land at Chipstead Sailing Club should be allocated to be retained and protected for use as a non-commercial sailing club and ancillary facilities/uses.”
DM324	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	Welcomes the aims but is concerned that the vision seems to focus on preservation only. Would expect within the Green Infrastructure policy that there would be a commitment to large landscape scale projects within the Biodiversity Opportunity Areas identified within the Core Strategy and throughout the urban areas wherever possible.
DM374	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Open space can be used for SUDS schemes, and SUDS schemes can also contribute to the GI network. The final sentence of paragraph 7.13 could be amended to: “This is one of the key aims of the multifunctional GI network”
DM400	Jennifer Bate	Kent Downs AONB	Support the approach subject to changes	Suggest that some local mineral and waste sites in the Sevenoaks District could provide some open space provision in the longer term. Early proactive engagement with operators and the MPA (KCC) could ensure that restorations are related to the Sevenoaks LDP needs.
DM417	Janice Butler	Leigh Parish Council	Support the approach subject to changes	Wish to be advised what if any land is protected by saved policy EN9 within the parish, and whether The Green part of the Green Infrastructure Network? Also require confirmation of type of protection for school playing fields in Lealands Avenue.
<u>Policy GRN2 Reuse of School Playing Fields</u>				
DM28	Thomas Rand		Object to the approach or wording	Add - School playing fields should NOT be sold for any Development other than for Sport or Recreation
DM375	Paul Crick	Environment and Planning Division Kent County Council	Object to the approach or wording	Policy GRN2 does not give KCC flexibility for its changing educational provision across the Sevenoaks district.
DM11	Karen Jefferys		Support the approach	If there is sufficient consultation.

Ref No	Name	Organisation	Nature of Representation	Summary
DM89 DM127 DM169 DM351	Christine Lane Tracy Godden Cllr John Edwards-Winser Hugh D'Alton	Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council Sevenoaks Town Council	Support the approach	Support.
DM59	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	See response under policy SC4. Whilst accepting the principle behind this policy for the retention of facilities for public usage, infrastructure, policies/procedures should be put in place to deter misuse.
DM135	Gillian King Scott	Clerk Halstead Parish Council	Support the approach subject to changes	Supports the re-use of school playing fields for sports and recreational, community activities but believe these redundant school sites should not be used as land for housing.
DM432	Jennifer Wilson	Environmental Agency	Support the approach subject to changes	The policy should be reworded to state: "Where a school playing field becomes available as a result of a school closure it shall be retained as part of the Green Infrastructure Network for community sports and recreational uses. Supporting.....pitch. Proposals for built development on playing fields, other than for essential facilities for outside sport and recreation will be refused."
<u>Policy EMP1 Employment</u>				
DM191	Graham Simpkin	Graham Simpkin Planning	Object to the approach or wording	Clear guidance is required on the extent to which GB sites may be extended/upgraded or replaced. There should be a policy that protects and allows these sites to be improved, upgraded and for replacement buildings without having to rely upon very special circumstances.
DM249	Dennis Pope	Nathaniel Lichfield & Partners	Object to the approach or wording	Policy SP8 already provides sufficient criteria to ensure the protection of employment land. The word "protection" within proposed Policy EMP1 duplicates Policy SP8. It is not necessary for further criteria in relation to the protection of employment sites. The policy as drafted would appear to relate to the improvement of the Districts employment provision as opposed to its protection. For the above reasons the words "protect and" should be deleted from the first sentence in EMP1

Ref No	Name	Organisation	Nature of Representation	Summary
DM60 DM90 DM170 DM310 DM376	Trevor R Hall Christine Lane Cllr John Edwards-Winser United House Paul Crick	Developer Contributions Manager Kent Police Town Clerk Edenbridge Town Council Planning Potential Ltd Environment and Planning Division Kent County Council	Support the approach	Support policy.
DM496	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach	Support but do not consider that it replaces Local Plan Policy EP8 (and neither does Appendix 2).
DM32	Leigh Family	Carter Planning Limited	Support the approach subject to changes	Paragraph 8.2 should be amended to include reference to the provision in SP8 that employment sites will be retained unless it can be demonstrated that there is no reasonable prospect of their up take or continued use for business purposes. Leighs Yard should be removed from the identified employment sites in Edenbridge and beneficial use made of the site.
DM327	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	To ensure these gains for biodiversity we would recommend the following changes to the policy When considering proposals for employment development, the Council will assess the impact of such proposals on the environment, economy, and community and on the transport network; and ensure there is no harm to surrounding uses, including nature conservation areas and that biodiversity is enhanced and extended and the site fully integrated into the Green Infrastructure network.
DM335	Armstrong (Kent) LLP	Christopher Hill GVA Grimley	Support the approach subject to changes	Promote Fort Halstead and justification based on loss of employment
DM352	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	Broadly welcomes the proposed policy, these restrictions should not be at the cost of home working.

Ref No	Name	Organisation	Nature of Representation	Summary
<u>Policy LC1 Sevenoaks Town Centre</u>				
DM195	R Freeman	The Theatres Trust	Object to the approach or wording	Policy LC1 does not deal adequately with other town centre uses to reflect PPS4 and in particular, your evening economy. The third paragraph provides hardly any development guidance for uses other than shops in your main town centre. PPS4 Policy EC4.2 should be reflected in the policy.
DM237	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	The policy relating to the primary retail frontage seeking the retention of existing retail units is over prescriptive and does not take proper account of the more flexible approach set out in PPS4.
DM353	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	Supports policy LC1 subject to regular review, however some flexibility must be retained/built into the system due to the sudden and rapid changes that the retail market is capable of making.
DM377	Paul Crick	Environment and Planning Division Kent County Council	Support the approach	The approach to Town Centre policies for Sevenoaks, Swanley and Edenbridge, Neighbourhood and Village Centres is supported.
DM61	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	In general supports this policy. However, any increase in A4, especially if coupled with A5 usage and as Late Night Refreshment Houses has the potential for a significant increase in demand for policing services and each application for such would be considered very seriously by Kent Police.
DM232 DM171	Brenda Hambrook Cllr John Edwards-Winser	Otford Parish Council	Support the approach subject to changes	In the interests of maintaining a vibrant retail sector, properties sited along the secondary frontage (being generally more vulnerable to overhead charges than those located on the primary frontage) should be more favourably assessed for business rates.
<u>Policy LC2 Swanley Town Centre</u>				
DM29	D.A.T Siggins		Object to the approach or wording	Do we really need more betting shops ,tanning parlours , food takaways etc ? Free vehicle parking to attract visitors to the town is not the answer.
DM45	Christopher Drake	Assistant Town Clerk Swanley Town Council	Object to the approach or wording	Station Road should be included within primary or secondary frontage
DM238	Jo Tasker	Robinson Escott	Object to the approach or	The policy relating to the primary retail frontage seeking the retention of existing retail units and only

Ref No	Name	Organisation	Nature of Representation	Summary
		Planning	wording	allowing changes to other A class units is over prescriptive and does not take proper account of the more flexible approach set out in PPS4. Will what the Council considers to be a "prominent" retail unit be shown on the proposals map?
DM12	Karen Jefferys		Support the approach	Pleased to see that Swanley centre is getting some attention in the strategy
DM378	Paul Crick	Environment and Planning Division Kent County Council	Support the approach	The approach to Town Centre policies for Sevenoaks, Swanley and Edenbridge, Neighbourhood and Village Centres is supported.
DM62	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	In general support this policy. However, any increase in A4, especially if coupled with A5 usage and as Late Night Refreshment Houses has the potential for a significant increase in demand for policing services and each application for such would be considered very seriously by Kent Police.

Policy LC3 Edenbridge Town Centre

DM239	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	Swanley is higher in the settlement hierarchy than Edenbridge. Why does Edenbridge have a higher percentage of units required to be retained in A1 use? Will what the Council considers to be a "prominent" retail unit be shown on the proposals map?
DM298 DM379	J.L Phillips Paul Crick	Tandridge D C Environment and Planning Division Kent County Council	Support the approach	Support .
DM63	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	In general supports this policy. However, any increase in A4, especially if coupled with A5 usage and as Late Night Refreshment Houses has the potential for a significant increase in demand for policing services and each application for such would be considered very seriously by Kent Police.
DM91	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	Assuming that should significant changes take place a review would be forthcoming a minimum of 60% A1 was considered appropriate.

Policy LC4 Neighbourhood Centres

Ref No	Name	Organisation	Nature of Representation	Summary
DM128	Tracy Godden	Clerk Dunton Green Parish Council	Object to the approach or wording	Continues to object to Dunton Green's classification as 'urban'.
DM233 DM172	Brenda Hambrook Cllr John Edwards-Winser	Otford Parish Council	Object to the approach or wording	Add criteria, a) Any adverse effects upon local neighbourhood centres should be carefully assessed before any agreement to introduce a (major) supermarket/retail centre into/adjoining the neighbourhood be considered. b) That an annual average turn-over for each shop within the recognised 'Neighbourhood Centre' be assessed before the arrival of a new supermarket/retail centre. c) A compensation scheme should be agreed in case a retailer located within the designated 'neighbourhood centre' fails within a year due to direct competition from the new development
DM240	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	The use of the term "broad ratio" is an unexplained term and could cause confusion in terms of its interpretation.
DM380	Paul Crick	Environment and Planning Division Kent County Council	Support the approach	The approach to Town Centre policies for Sevenoaks, Swanley and Edenbridge, Neighbourhood and Village Centres is supported.
DM64	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	In general supports this policy. However, any increase in A4, especially if coupled with A5 usage and as Late Night Refreshment Houses has the potential for a significant increase in demand for policing services and each application for such would be considered very seriously by Kent Police.
DM354	Hugh D'Alton	Sevenoaks Town Council	Support the approach subject to changes	1. The northern ST Johns area needs to be extended downwards to incorporate the garage at the bottom of the hill. 2. South St Johns needs to be modified to incorporate Johns house furnishings. 3. Conversions to fast food takeaways should only be approved when the applicants can show provision for parking within 15 m of the establishment.
<u>Policy LC5 Village Centres</u>				

Ref No	Name	Organisation	Nature of Representation	Summary
DM234 DM173	Brenda Hambrook Cllr John Edwards-Winser	Otford Parish Council	Object to the approach or wording	In Otford Village, given the close proximity of the two designated centres, recommend that they be combined into one centre so that any future alterations or changes be recognised as affecting the whole local retail economy not just parts of it.
DM241	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	The use of the term "broad ratio" is an unexplained term and could cause confusion in terms of its interpretation.
DM244	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	Village Centre maps such as Brasted show village boundaries that dissect properties and do not seem logical. A check of the boundary should be undertaken.
DM418	Janice Butler	Leigh Parish Council	Object to the approach or wording	Add Leigh – important to prevent change of use of village shop and pub, the Fleur de Lis. Adjacent to the High Street there is the hairdresser, the shop, the pub, Leigh Motors and just along the start of Penshurst Road Fairlawn Garden Services and DART, the Corvette repair business so hope this can be considered to make 5 units
DM460	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	Eynsford must be designated/listed here.
DM299 DM381	J.L Phillips Paul Crick	Tandridge D C Environment and Planning Division Kent County Council	Support the approach	Support
DM65	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	If Village Centres did an increase in A4 and A5 then the same comments as contained in LC1 – LC3 would apply.
DM270	Holly Ivaldi	Clerk Eynsford Parish Council	Support the approach subject to changes	Para 9.28 - Eynsford must be designated/listed here.
DM497	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Concerned that this Policy is proposed to replace Policy S3A of the Local Plan as it will mean that for those smaller rural communities that do not have a defined village centre there is no equivalent specific protection for shops and services. Notwithstanding the general protection that may be offered

Ref No	Name	Organisation	Nature of Representation	Summary
				<p>by Core Strategy Policy L07. Policy LC5 should be extended to ensure the retention of shops and services in the smaller rural communities along the line of Local Plan Policy S3A.</p> <p>The Policy could helpfully include support for 'community right to buy' initiatives.</p> <p>Do not consider that it replaces Local Plan Policy S6 (and neither does Appendix 2).</p>
<u>Policy LT1 Hotels and Tourist Accommodation</u>				
DAM	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach	Refers to its previous relevant comments including those on preceding proposed policies. Re-iterates the issue around parking on Highways and obstructions to emergency vehicles and the need for this to be mitigated.
DM92 DM129 DM355	Christine Lane Tracy Godden Hugh D'Alton	Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council Sevenoaks Town Council	Support the approach	Support
DM328	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	<p>Recommend that the following wording be incorporated into LT2.</p> <p>Proposals for new tourist facilities will be permitted where they are located within the built confines of an existing settlement and where they do not generate activity levels which would harm the character ecology or amenities of the locality.</p> <p>Proposals to create tourist facilities in the Green Belt through restoration or re-use rural of buildings will be considered against their impact on the openness and tranquillity of the Green Belt and countryside and their impact on biodiversity and will only be accepted where it is demonstrated by the applicant that activity levels would not be such as to harm the character ecology or amenities of the locality.</p> <p>Proposals to create new buildings for tourist facilities in the Green Belt are considered to be</p>

Ref No	Name	Organisation	Nature of Representation	Summary
				inappropriate development and will be resisted.
DM498	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Paragraph 10.11 should also acknowledge potential impact on the Green Belt.
Policy LT2 New Tourist Attractions and Facilities				
DM242	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	The use of the word "tranquillity" is not taken from Government Policy and should be omitted. The policy allows for no consideration of the merits of new tourist buildings. This is an unreasonably restrictive policy running contrary to the more flexible approach suggested within PPG2 and at policy EC12 of PPS4 that allows for the provision for replacement buildings
DM271	Holly Ivaldi	Clerk Eynsford Parish Council	Object to the approach or wording	There are no policies for other forms of outdoor recreation, such as war games, motor cycling, clay pigeon shooting, model aircraft flying etc.
DM356	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	Believes that in some cases it may be appropriate and needed to create new buildings on site, and provision must be retained for this. eg The Jeffery Harrison Visitor Centre at the Kent Wildlife Reserve in Sevenoaks Tourism is an important contributor to the local economy and STC does not welcome a blanket ban on Tourism developments in the green belt.
DM499	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach	Support, but the content of South East Plan Policy TSR5 should be considered, particularly in regard to need and location.
DM67 DM93 DM130 DM174	Trevor R Hall Christine Lane Tracy Godden Cllr John Edwards-Winser	Developer Contributions Manager Kent Police Town Clerk Edenbridge Town Council Clerk Dunton Green Parish Council	Support the approach	Support

Ref No	Name	Organisation	Nature of Representation	Summary
DM209	Derek Johnson	Clerk Chevening Parish Council	Support the approach subject to changes	Support, but there needs to be a clearer idea of activity levels.
DM329	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	<p>Recommend that the following wording be incorporated into LT2.</p> <p>Proposals for new tourist facilities will be permitted where they are located within the built confines of an existing settlement and where they do not generate activity levels which would harm the character ecology or amenities of the locality.</p> <p>Proposals to create tourist facilities in the Green Belt through restoration or re-use rural of buildings will be considered against their impact on the openness and tranquillity of the Green Belt and countryside and their impact on biodiversity and will only be accepted where it is demonstrated by the applicant that activity levels would not be such as to harm the character ecology or amenities of the locality.</p> <p>Proposals to create new buildings for tourist facilities in the Green Belt are considered to be inappropriate development and will be resisted.</p>
DM500	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Support the need for a Policy, but regard should be given to including relevant content of Policy TSR4 of the South East Plan.
<u>Policy LT3 Equestrian Development</u>				
DM243	Jo Tasker	Robinson Escott Planning	Object to the approach or wording	Criterion b) is inflexible and would not allow for the provision of stables to support grazing land that might not be located next to other buildings.
DM300	Hobson		Object to the approach or wording	Suggest that clause b) be amended to change "farm buildings or other groups of buildings," to ""farm buildings, other groups of buildings or an associated dwelling,"
DM357	Hugh D'Alton	Sevenoaks Town Council	Object to the approach or wording	Does not consider this policy to be appropriate as it brings employment into the local area.
DM401	Colin Dibsall		Support the approach	SPD required
DM68	Trevor R Hall	Developer Contributions Manager Kent	Support the approach	The development of Equestrian Facilities is not a matter for Kent Police unless they generate a potential increase in demand for policing services.

Ref No	Name	Organisation	Nature of Representation	Summary
		Police		
DM131 DM175 DM200	Tracy Godden Cllr John Edwards-Winser Lynda Harrison	Clerk Dunton Green Parish Council West Kingsdown Parish Council - clerk	Support the approach	Support
DM46	Christopher Drake	Assistant Town Clerk Swanley Town Council	Support the approach subject to changes	A policy on horses/stabling near residential areas (such as Swanley Village) is required
DM94	Christine Lane	Town Clerk Edenbridge Town Council	Support the approach subject to changes	Mostly agree with identified approach, add "sufficient off road riding areas are available"
DM279	B Ide	Shoreham Parish Council	Support the approach subject to changes	b) add, at end of "other groups of building" "or an associated dwelling".
DM330	Debbie Salmon	Kent Wildlife Trust	Support the approach subject to changes	Recommend that the following wording be added to the policy. f) The development should not result in an adverse impact on the character of the landscape or ecological value of the area in which it is situated
DM382	Paul Crick	Environment and Planning Division Kent County Council	Support the approach subject to changes	Reference to the terrestrial environment should be included in criterion (e).
DM441	Angela Howells	Clerk Westerham Parish Council	Support the approach subject to changes	A factor not mentioned in the text is the need to ensure a necessary minimum of open land to support the number of horses to be accommodated in the stables, without degrading the quality of the landscape. WPC expects that that aspect will be covered in the proposed SPD.
DM501	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	It needs to also include reference to the cumulative effect of small equestrian developments.
Policy LT4 Brands Hatch				

Ref No	Name	Organisation	Nature of Representation	Summary
DM210	Lynda Harrison	West Kingsdown Parish Council - Clerk	Object to the approach or wording	The wording of policy WK2 is preferable to LT4. It in no way replaces policy WK6 as this states "The local planning authority will not permit new development, particularly housing, in areas subject to excessive noise disturbance " Policy ECC2 - noise pollution, policy WK6 could be replaced by additional criteria in policy ECC2.
DM461	Naomi Wolfe	Eynsford Parish Council	Object to the approach or wording	There are no policies for other forms of outdoor recreation, such as war games, motor cycling, clay pigeon shooting, model aircraft flying etc.
DM176	Cllr John Edwards-Winser		Support the approach	Support, providing current measures are enforced
DM69	Trevor R Hall	Developer Contributions Manager Kent Police	Support the approach subject to changes	Where increase of use are proposed then Brands Hatch management must be required to make provision for the necessary number of Stewards/Marshalls within the venue to ensure the safety of the public attending, as required by any Safety Certificate, Licenses, Insurances, etc without reliance on policing services and the provision of suitable temporary traffic management infrastructure deemed appropriate through multi agency discussions with the event organiser/Brands Hatch.
DM100	Alison de Jager	Ash-cum-Ridley Parish Council	Support the approach subject to changes	Development should only be supported if the overall affect is a reduction in noise levels and this should be expanded to include residential properties anywhere in the surrounding area.
DM502	Brian Lloyd	CPRE Protect Kent (Sevenoaks Committee)	Support the approach subject to changes	Would rather see the retention of the wording in Policy WK2. The Policy would be better located in the Green Belt section of the DPD, following after the major development sites. Also, it should be additionally referenced that it replaces Local Plan Policy WK6 in accordance with Appendix 2.

CONSULTATION ON SITES FOR GREEN INFRASTRUCTURE, OPEN SPACE, SPORT AND RECREATION

LDF ADVISORY GROUP - 7 SEPTEMBER 2011

Report of the: Director of Community and Planning Services

Status: For Consideration

Key Decision: No

This report supports all of the Key Aims of the Community Plan

Portfolio Holder Cllr. Jill Davison

Head of Service Head of Development Services – Jim Kehoe

Recommendation: It be RESOLVED that:

- (a) the Green Infrastructure, Open Space, Sport and Recreation sites be agreed and published for consultation
 - (b) the Portfolio Holder be authorised to agree minor changes prior to publication to assist the clarity of the document
 - (c) copies to be made available electronically and in hard copy at a price to be agreed with the Portfolio Holder
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Reason for recommendation:

To progress the Council's Local Development Framework

Introduction

- 1 Following adoption of the Core Strategy, the second development plan document that is being prepared as part of the LDF is the Allocations and Development Management DPD (ADM DPD). This document will identify sites to achieve the aims of the Core Strategy and contain a series of generic policies against which planning applications will be determined.
- 2 Consultation has previously taken place on site allocations related to land for housing, employment and mixed use development in Spring 2010. Consultation on draft Development Management policies took place in May-August 2011.
- 3 The attached document relates to a supplementary consultation on sites to be protected for Green Infrastructure, Open Space, Sport and Recreation. The sites were identified by the Open Space, Sport and Recreation Study,

Agenda Item 7

Local Development Framework Advisory Group – 7 September 2011

published in January 2009, which was based on an audit of open space provision and provided an evidence base for the Core Strategy.

- 4 As there was little response to calls for sites for open space in previous rounds of consultation, this consultation provides a further opportunity to comment on the proposed open space allocations and a further opportunity to identify any additional land for open space. It also invites any proposals for Local Green Space, which is a new commitment set out in the Government's Natural Environment White Paper, to allow local communities to designate important local green space.
- 5 There are two sites where it is proposed to remove the previous open space policy protection, known as 'EN9' after the related Local Plan policy. This is because they are either subject to an approved development scheme, or have been allocated for development via the draft ADM DPD. These sites are:
 - Sevenoaks – site south of Rockdale – planning permission for care-home development.
 - Westerham – site off London Road (previous Churchill school site) – allocated for development.
- 6 It is intended to run this consultation from the end of September for six weeks. Details of the consultation will be publicised by a press release and the documents will be available online on the Council's website, in libraries and at the Council offices and notification of the consultation will be sent to town and parish councils and to organisations and individuals on our mailing list.
- 7 The comments received as part of this consultation will be considered by SDC and it is the intention to publish a final version of the ADM DPD in spring 2012, for pre-submission consultation and independent examination.

Other Options

8. The options are to agree, vary or reject the open space sites for Consultation. The sites will form part of the LDF. Overall it is considered that the sites for consultation are appropriate to assist in achieving the detailed objectives of the Core Strategy.

Key Implications

Financial

9. Budgetary provision has been made for the cost involved in preparing the Allocations and Development Management DPD. Combining the Allocations and development policies into one document will achieve a significant budget saving in publication and examination costs compared with maintaining two separate DPDs.

Community Impact and Outcomes

10. The preparation of this consultation has had close regard to the Community Strategy vision to create a green and healthy environment. The allocation of sites for open space is consistent with the aims of the Core Strategy DPD and Community Strategy and contributes to the implementation of many of the Community Strategy priorities. The designation and protect of open space should lead to a wide range of positive outcomes for the community.

Legal, Human Rights etc.

11. The preparation of an LDF is a requirement under planning legislation. The adopted Allocations and Development Management DPD will form part of the “Development Plan” and has special status in the determination of planning applications. There are requirements regarding notification of interested parties and the production of a statutory notice at the adoption stage and these procedures will be followed.

Equality Impacts

12. An updated Equality Impact Assessment was carried out for the Core Strategy in accordance with Council policy. The allocation of open space sites is in conformity with the Core Strategy, however an independent Equality Impact Assessment will be carried out as the document moves towards publication stage. The findings of the Core Strategy appraisal have been taken into account in finalising this document.

Sustainability Checklist

13. A Sustainability Appraisal report on the Allocations Options document and Draft Development Management Policies has been carried out in accordance with Government guidance. A Sustainability Appraisal has also been prepared for this open spaces consultation which has been made available.

Conclusions

14. It is recommended that the sites to be protected for Green Infrastructure, Open Space, Sport and Recreation, which will form part of the Allocations and Development Management DPD, be agreed for public consultation.

Risk Assessment Statement

15. LDF documents are subject to independent examination and the principal risk involved with their preparation is that the examination finds the document to be unsound. The Allocations and Development Management DPD must be in accordance with the Core Strategy and other parts of the development plan and national planning guidance, however at this stage the document is at informal consultation stage seeking the views of key stakeholders in accordance with the Council’s Statement of Community Involvement

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Attached Documents

Appendix A – Consultation document

Appendix B – List of open space sites

Appendix C – Site Maps (due to the size of the maps it was not possible to reproduce them with the agenda. They are available to view on CMIS and paper copies will be displayed at the meeting)

Appendix D – Sustainability Appraisal

Contact Officer(s):

Hannah Gooden, 7178

Kristen Paterson - Community and Planning Services Director

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**Green Infrastructure, Open Space, Sport and Recreation – Consultation
– September**

Overview

Green Infrastructure (GI) performs a variety of functions including the conservation and enhancement of biodiversity as well as providing space for informal and formal recreation. GI can include parks and gardens (non-domestic), natural and semi-natural urban green spaces, green corridors, outdoor sports facilities, amenity green spaces, formal and informal play areas and facilities, allotments, cemeteries and churchyards, river and canal corridors.

Retention, improvement and management of informal and formal existing facilities across the District is a priority. Further provision of additional informal and formal recreational facilities for public use is also important to ensure suitable levels and standards are available to the public in the future. The intention is to bring forward a GI Network of designated and important green areas all across the District.

Policy Context

Core Strategy Policy SP10 of the adopted Sevenoaks Core Strategy (February 2011) identifies the generic requirements in relation to GI, open space, sport and recreation facilities and the recognised value that such facilities provide to the community. It states that a GI Network will be developed and that open space will be retained.

Core Strategy Policy SP11 on Biodiversity states that the biodiversity of the District will be conserved and opportunities sought for enhancement to ensure no net loss of biodiversity.

Core Strategy Policy LO8 on countryside and the rural economy states that the extent of the Green Belt will be maintained and that the countryside will be conserved and...its biodiversity will be protected and enhanced where possible.

Draft Development Management Policy GRN1 states that development proposals will only be permitted where it has been demonstrated that any impact on the GI network and biodiversity has been fully considered.

Draft Development Management Policy SC2 on Design Principles states that new development should...retain important GI Network features and should not result in the loss of buildings or related spaces that would have an unacceptable loss on the character of the area

Background

The above policies were informed by one of the LDF evidence base commissions, the Open Space, Sport and Recreation Study, published in

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January 2009. This was based on an audit of open space provision. It indicated generally that:

- There is enough accessible natural and semi natural green space
- More allotments and specific built sports facilities are needed (i.e. tennis courts)
- There is a shortfall in amenity open space, playing fields, parks and children's playgrounds in some locations (particularly in Swanley south of the railway line and in West Kingsdown).

The Allocations and Development Management (ADM) DPD now seeks to identify specific sites for protection and additional provision. As part of the Allocations Options consultation in February 2010, we invited comments on existing facilities and provision and requested details of possible new sites for inclusion. We also included a call for sites for open space provision within the draft Development Management Policies consultation in May - August 2011.

We are now conducting this further, site specific consultation to inform the future policy approach and the consideration of the wider GI network issues.

Previous Open Space Designation ('EN9' sites)

It is noted that many of the sites are protected under saved Local Plan Policy EN9. Once the ADM DPD is adopted, the EN9 designation will be superseded by the open space sites identified in this consultation. Where both designations are shown on the mapping, it is the Open Spaces Study boundary that will be taken forwards.

There are two EN9 sites that it is proposed to de-designate, because they are either subject to an approved development scheme, or have been allocated for development via the draft ADM DPD. These sites are:

- Sevenoaks – site south of Rockdale – planning permission for care-home development
- Westerham – site off London Road (previous Churchill school site) – allocated for development

Protection of Existing Sites

For the purposes of the ADM DPD, the designations for open space and recreational facilities have been assessed against the following criteria:

- Function of the open space (from Open Space Study typology)
- Sites within defined settlement boundaries (towns and villages)
- Quality and management arrangements
- Size threshold

Function / Typology

The Open Spaces Study, which is the evidence base document that has informed this policy, has outlined the function of each of the identified open spaces. This typology is outlined below:

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Allotments and Community Gardens
Amenity green spaces
Cemeteries and churchyards
Green corridors
Natural and semi-natural urban green spaces
Outdoor sports facilities
Parks and Gardens
Young People and Children's playspace

Boundary

All the open space sites that have been identified are within the urban confines of towns and villages. Sites have not been identified for protection outside these areas, since all areas outside the identified towns and villages are protected by virtue of being part of the Metropolitan Green Belt. Thus it would be unnecessary duplication to identify open space sites for protection in the Green Belt. Additionally, the GI Network defined within the draft ADM DPD is District wide and affords protection to all sites identified by the Open Space, Sport and Recreation Study which lie in the Green Belt.

Quality

Sites have been identified which are important to the visual amenity of the locality or provide informal recreation/playspace and wildlife habitats. The Open Space, Sport and Recreation Study sets quality standards for each typology and each site has been graded in terms of their current quality level. Sites graded as good and very good should be maintained and sites graded average to very poor should be improved to meet the local quality standard outlined in the Study.

Size

A minimum size threshold for has been set at 2000sqm or 0.2ha for GI sites, partially due to cartographic reasons, since mapping every open space would not be practicable, and also to be consistent with the allocations for housing and employment sites, where a 0.2ha threshold is also applied. However, it should be noted that if a site is smaller than 0.2ha, and is therefore not mapped or listed in the schedule, it does not mean that this site is not protected. The policies outlined in the adopted Core Strategy and the draft ADM DPD seek to protect all areas of GI that are of value to the local community, regardless of their size.

Please note that if a site is not mapped because it is below the 0.2ha threshold, this does not mean it is not protected. It is likely that smaller sites, such as play areas, are likely to fall under the threshold.

Schedule

A list of the Open Space sites identified for protection is included as a Appendix to this document, together with plans of the sites.

Additional Provision to address Deficiencies

The Core Strategy Policy SP10 sets out that the Council will seek opportunities, including through new development, to create and extend green

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space and to enhance the biodiversity value of open space. Residential development in areas where there is an existing shortage in open space, or where the development would result in a shortage of provision, will be expected to contribute to overcoming the shortage, either through provision on site, a financial contribution or to off site provision.

We would like the ADM DPD to include proposals for new sites to address deficiencies in provision identified in the Open Space, Sport and Recreation Study, where these are supported by the local community. There is a need to provide for new sites and to improve the access to some existing sites within the District. The Study found a shortage of open space provision in Swanley, particularly south of the railway line, and in West Kingsdown.

If you are aware of any land or sites, in these areas of deficiency, which could be suitable for open space or recreational use, we would like to receive details of them. Please provide a site plan and details of ownership.

Draft National Planning Policy Framework (NPPF) and Open Space

The draft National Planning Policy Framework (NPPF), published in July 2011, facilitates the Government's commitment in the Natural Environment White Paper to allow communities to designate important local green spaces for special protection. Local Green Space can be designated where the area is demonstrably special to a local community and holds particular local significance because of its beauty, historic importance, recreational value, tranquillity or richness in wildlife. This consultation invites the local community to put forward any local green space within Sevenoaks District, that is of value to the local community. It is suggested that land designated as natural and semi natural or amenity green space might be the most appropriate type of land for this designation. Any proposed space should be in close proximity to a centre of population, not overlap with the Green Belt (which is already protected by virtue of its designation) and should be local in character and not an extensive tract of land.

Allocation Policy:

The following sites within the urban confines of towns and villages across the District, shown on the attached site maps and schedule, are allocated for GI, Open Space, Sport and Recreation and shall be protected in this use in line with Core Strategy policies SP10, SP11 and LO8 and draft Development Management policy GRN1 and SC2.

Consultation Questions

- Please assist us in identifying any additional existing open space, amenity value, sport and recreational facilities (within a town or village)

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boundary) or spaces which you think should be designated as Local Green Space

- If you are aware of any other land or sites which could be suitable for open space or recreational use, we would also like to receive details of them.
- If there are any sites currently safeguarded as open space (EN9) or shown as proposed allocations that you think should not be allocated, or should have a different boundary, then please let us know.

Appendices:

Maps of GI in urban areas (above 0.2ha threshold)

Schedule of open spaces (above 0.2ha threshold)

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Site Number	Site Name	Settlement	Typology	Area in Meters	Hectares	EN9?
603	Brastead Recreation Ground	Brasted	Outdoor Sports Facility	16465.65	1.65	
639	All Souls Church	Crockenhill	Cemeteries and Churchyards	2400.95	0.24	
11	Seven Acres AGS	Crockenhill	Amenity Greenspace	3998.30	0.40	
643	Newports AGS	Crockenhill	Amenity Greenspace	4309.58	0.43	EN9
577	Harvestfield Park	Crockenhill	Parks and Gardens	28857.05	2.89	
704	Church Street AGS	Edenbridge	Amenity Greenspace	2163.25	0.22	EN9
934	Edenbridge Primary School Hardcourts	Edenbridge	Young People and Children	2167.10	0.22	
542	Skeynes Road AGS 2	Edenbridge	Amenity Greenspace	3160.36	0.32	EN9
318	Four Elms Road AGS	Edenbridge	Amenity Greenspace	3819.07	0.38	EN9
367	Farmstead Drive AGS	Edenbridge	Amenity Greenspace	3841.54	0.38	EN9
369	Park Avenue AGS	Edenbridge	Amenity Greenspace	5959.70	0.60	EN9
545	St Peter + St Pauls Church	Edenbridge	Cemeteries and Churchyards	6014.24	0.60	
965	Swan Lane Allotments	Edenbridge	Allotments and Community Gardens	6027.34	0.60	
998	Edenbridge Leisure Centre STP	Edenbridge	Outdoor Sports Facility	6723.41	0.67	
327	Cedar Drive AGS	Edenbridge	Amenity Greenspace	6956.46	0.70	EN9
547	St Peter + St Pauls Church Cemetery	Edenbridge	Cemeteries and Churchyards	11804.13	1.18	
933	Edenbridge Primary School	Edenbridge	Amenity Greenspace	11875.64	1.19	
536	Church Street NSN	Edenbridge	Natural & Semi Natural	39625.74	3.96	
997	Stangrove Park AGS	Edenbridge	Amenity Greenspace	43420.47	4.34	EN9
532	Lingfield Road Rec. Ground	Edenbridge	Outdoor Sports Facility	108587.95	10.86	
999	Chestnut Close AGS	Edenbridge	Amenity Greenspace	1811.77	0.18	EN9
935	Greenfield AGS	Edenbridge	Amenity Greenspace	1854.98	0.19	EN9
975	Field Close NSN	Edenbridge	Natural & Semi Natural	1474.26	0.15	EN9
541	Skeynes Road AGS 1	Edenbridge	Amenity Greenspace	1683.26	0.17	EN9
14	Field Drive AGS	Edenbridge	Amenity Greenspace	1738.67	0.17	EN9
725	St Martins Church	Eynsford	Cemeteries and Churchyards	5318.50	0.53	
723	Saddlers Park AGS	Eynsford	Amenity Greenspace	1558.54	0.16	EN9
734	Oliver Crescent AGS	Farningham	Amenity Greenspace	6542.67	0.65	EN9
732	St Peters and St Pauls Church	Farningham	Cemeteries and Churchyards	7686.19	0.77	
662	Southdene AGS	Halstead	Amenity Greenspace	2736.37	0.27	EN9
764	Ash Road AGS	Hartley	Amenity Greenspace	2574.64	0.26	EN9
781	Chantry Avenue AGS	Hartley	Outdoor Sports Facility	4028.63	0.40	EN9
769	Woodland Avenue Allotments	Hartley	Allotments and Community Gardens	5425.96	0.54	EN9
1032	Our Lady of Hartley Primary School	Hartley	Outdoor Sports Facility	6915.67	0.69	
772	Woodlands Avenue Playing Field	Hartley	Outdoor Sports Facility	8491.27	0.85	EN9
1038	Gorsewood	Hartley	Natural & Semi Natural	12370.50	1.24	

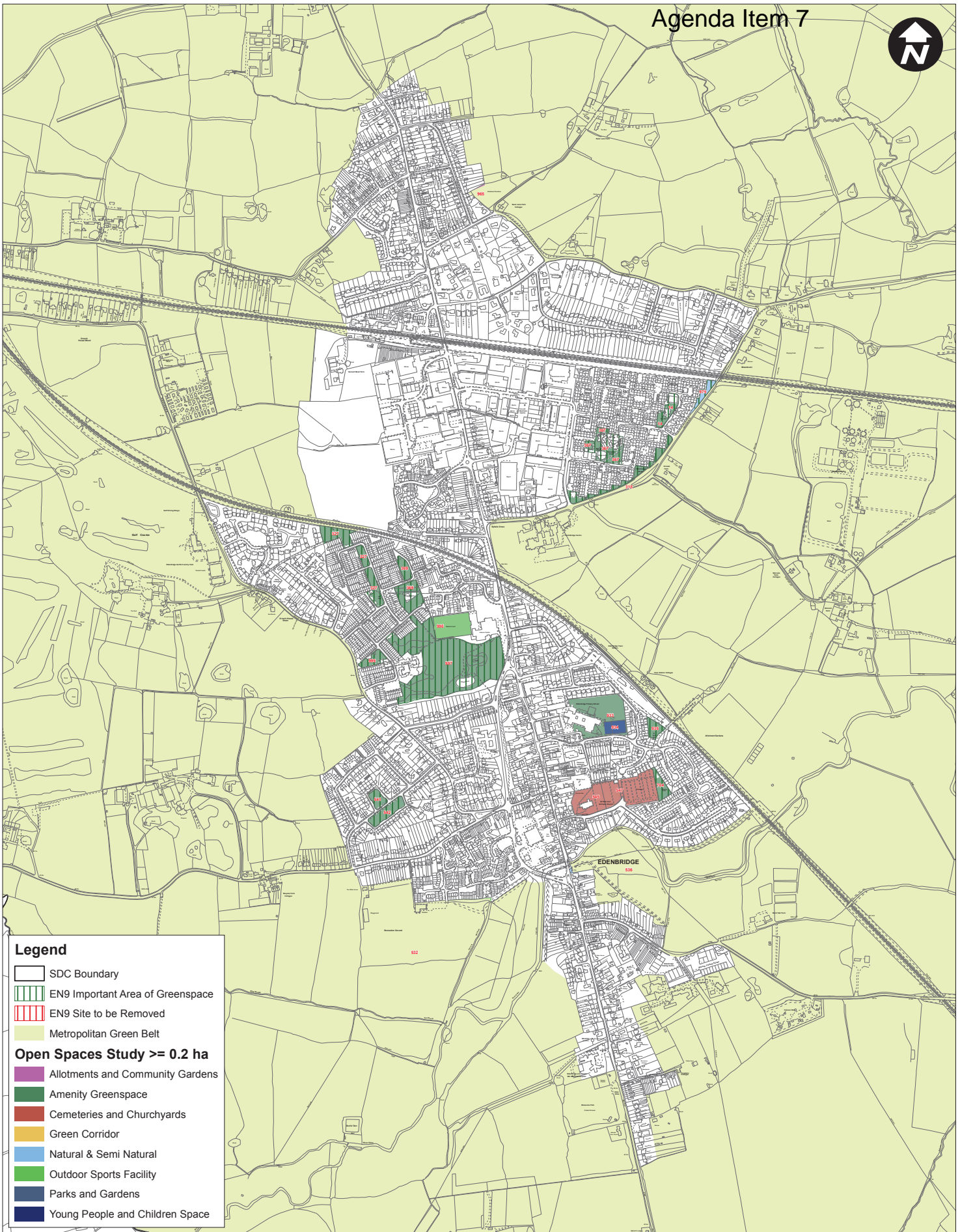
33	Furness School Top Playing Field	Hextable	Outdoor Sports Facility	4130.37	0.41
23	Claremont AGS	Hextable	Amenity Greenspace	7431.91	0.74 EN9
2	Hextable Village Green	Hextable	Amenity Greenspace	7590.46	0.76 EN9
5	Hextable Primary School	Hextable	Outdoor Sports Facility	13398.79	1.34 EN9
4	Furness School Playing Field	Hextable	Outdoor Sports Facility	16240.09	1.62 EN9
1010	Fairfield Amenity Area	Kemsing	Amenity Greenspace	2712.63	0.27
710	Barnfield Crescent	Kemsing	Amenity Greenspace	5534.09	0.55 EN9
715	Kemsing Church	Kemsing	Cemeteries and Churchyards	11543.83	1.15
714	Kemsing Primary School	Kemsing	Outdoor Sports Facility	15660.57	1.57
1009	Green Hill	Kemsing	Natural & Semi Natural	166653.00	16.67
1005	Oxenhill Meadow	Kemsing and Otford	Natural & Semi Natural	196814.77	19.68
667	Poundside Recreation Ground	Knockholt	Amenity Greenspace	2867.43	0.29 EN9
1023	Leigh Tennis Club	Leigh	Outdoor Sports Facility	2378.28	0.24 EN9
388	Lealands Avenue Playing Field	Leigh	Outdoor Sports Facility	7947.62	0.79 EN9
396	Lower Green Allotments	Leigh	Allotments and Community Gardens	8432.94	0.84
383	The Green	Leigh	Outdoor Sports Facility	17835.42	1.78 EN9
384	War Memorial Green	Leigh	Amenity Greenspace	1411.93	0.14 EN9
385	War Memorial Green South	Leigh	Amenity Greenspace	574.04	0.06 EN9
833	Ayelands Estate Grounds	New Ash Green	Amenity Greenspace	2207.94	0.22
879	Farm Holt Buffer Zone A	New Ash Green	Amenity Greenspace	2239.46	0.22
858	Church Road AGS A	New Ash Green	Amenity Greenspace	2312.54	0.23
807	Coltstead Estate Grounds A	New Ash Green	Amenity Greenspace	2324.76	0.23
906	Punch Croft Estate Grounds	New Ash Green	Amenity Greenspace	2403.51	0.24
804	Coltstead Buffer Zone A	New Ash Green	Amenity Greenspace	2683.61	0.27
819	Coltstead Buffer Zone B	New Ash Green	Amenity Greenspace	2701.06	0.27
810	Coltstead Estate Grounds B	New Ash Green	Amenity Greenspace	2770.01	0.28
922	Lambardes Buffer Zone	New Ash Green	Amenity Greenspace	3462.04	0.35
798	Chapel Wood Road AGS	New Ash Green	Amenity Greenspace	4309.86	0.43
839	Ayelands Buffer Zone B	New Ash Green	Amenity Greenspace	4849.05	0.48
954	Manor Forstal Buffer Zone	New Ash Green	Amenity Greenspace	5466.76	0.55
853	Penenden Buffer Zone and Triangle	New Ash Green	Amenity Greenspace	5605.33	0.56
1157	Chapel Wood Buffer Zone	New Ash Green	Amenity Greenspace	6301.57	0.63
962	Knights Croft Buffer Zone A	New Ash Green	Amenity Greenspace	7163.47	0.72
846	Olivers Mill Buffer Zone	New Ash Green	Amenity Greenspace	7438.16	0.74
837	Ayelands Buffer Zone A	New Ash Green	Amenity Greenspace	7565.94	0.76
1162	Bazes Shaw	New Ash Green	Natural & Semi Natural	7842.04	0.78
893	Farm Holt Buffer Zone B	New Ash Green	Amenity Greenspace	8535.50	0.85

1161	The Orchard	New Ash Green	Natural & Semi Natural	10142.89	1.01
852	Penenden Buffer Zone A	New Ash Green	Amenity Greenspace	10634.52	1.06
1158	Northfield Bank	New Ash Green	Amenity Greenspace	11373.53	1.14
963	Knights Croft Buffer Zone B	New Ash Green	Amenity Greenspace	11520.49	1.15
943	Spring Cross Wood	New Ash Green	Natural & Semi Natural	14328.58	1.43
821	Turners Oak Shaw	New Ash Green	Natural & Semi Natural	15307.61	1.53
902	Punch Croft Buffer Zone	New Ash Green	Natural & Semi Natural	18040.46	1.80
795	New Ash Green Primary School	New Ash Green	Outdoor Sports Facility	26604.16	2.66
1164	Nine Horse Wood	New Ash Green	Natural & Semi Natural	71201.22	7.12
794	Pond, Springcroft and Redhill Woods	New Ash Green	Natural & Semi Natural	78841.20	7.88
686	Willow Park AGS	Otford	Amenity Greenspace	2049.39	0.20 EN9
693	Otford Village Green	Otford	Amenity Greenspace	3496.52	0.35 EN9
688	Telston Park	Otford	Amenity Greenspace	4442.27	0.44 EN9
685	St Bartholomews Church	Otford	Cemeteries and Churchyards	5823.65	0.58
679	Otford Allotments B	Otford	Allotments and Community Gardens	11932.62	1.19
692	Palace Field	Otford	Natural & Semi Natural	12460.31	1.25 EN9
697	The Otford Ponds	Otford	Natural & Semi Natural	18459.02	1.85
698	Chalk Pit Rec Ground	Otford	Natural & Semi Natural	27413.78	2.74 EN9
677	Otford Village Pond	Otford	Natural & Semi Natural	870.28	0.09 EN9
216	Zambra Way AGS	Seal	Amenity Greenspace	2008.86	0.20 EN9
513	St Peter and St Pauls Church	Seal	Cemeteries and Churchyards	7823.05	0.78
617	Chevening Tennis Club	Sevenoaks	Outdoor Sports Facility	2177.09	0.22
555	Littlewood AGS	Sevenoaks	Amenity Greenspace	2356.96	0.24 EN9
326	Vine War Memorial AGS	Sevenoaks	Amenity Greenspace	2400.44	0.24 EN9
196	Donnington Road Allotments	Sevenoaks	Allotments and Community Gardens	2488.59	0.25 EN9
311	Vine Gardens	Sevenoaks	Parks and Gardens	2531.15	0.25 EN9
2041	AGS At Junction With London Road And Aisher Way	Sevenoaks	Amenity Greenspace	2614.78	0.26
312	Solefields Road AGS	Sevenoaks	Amenity Greenspace	2693.86	0.27 EN9
560	Hillingdon Rise Play Area	Sevenoaks	Young People and Children	3639.33	0.36 EN9
1134	Chesterfield Drive A AGS	Sevenoaks	Amenity Greenspace	3694.48	0.37 EN9
619	Bessels Green Road	Sevenoaks	Amenity Greenspace	3759.81	0.38 EN9
324	Judd's Piece	Sevenoaks	Natural & Semi Natural	3781.01	0.38 EN9
343	Britains Lane Wood	Sevenoaks	Natural & Semi Natural	4171.20	0.42 EN9
346	Julians Meadow Woodland	Sevenoaks	Natural & Semi Natural	4204.68	0.42 EN9
564	St Hilary's School	Sevenoaks	Outdoor Sports Facility	4241.49	0.42 EN9
1082	Hillingdon Avenue NSN	Sevenoaks	Natural & Semi Natural	4263.56	0.43 EN9
300	Granville School OSF	Sevenoaks	Outdoor Sports Facility	4312.38	0.43













1141	Hollybush Lane Tennis Courts	Sevenoaks	Outdoor Sports Facility	4503.11	0.45
2049	Middlings Wood	Sevenoaks	Natural & Semi Natural	4935.68	0.49 EN9
265	Beechmont Road/Sevenoaks Common	Sevenoaks	Natural & Semi Natural	5030.66	0.50
294	Hawthorn Lane Allotments	Sevenoaks	Allotments and Community Gardens	5057.78	0.51
286	Riverhead Allotments	Sevenoaks	Allotments and Community Gardens	5218.63	0.52 EN9
291	Mount Close Open Space	Sevenoaks	Amenity Greenspace	5469.51	0.55 EN9
290	St Mary's Church	Sevenoaks	Cemeteries and Churchyards	5509.78	0.55
570	St John's School Playing Field	Sevenoaks	Outdoor Sports Facility	5655.74	0.57 EN9
223	Watercress Close Play Area	Sevenoaks	Young People and Children	6125.07	0.61
284	Amherst School OSF	Sevenoaks	Outdoor Sports Facility	6316.11	0.63 EN9
616	Chipstead Lane AGS	Sevenoaks	Amenity Greenspace	6814.35	0.68 EN9
2048	Park Grange (Sevenoaks School)	Sevenoaks	Amenity Greenspace	7072.31	0.71 EN9
281	Braeside Avenue AGS	Sevenoaks	Amenity Greenspace	7121.91	0.71
302	Mount Harry Road NSN	Sevenoaks	Natural & Semi Natural	7251.71	0.73
266	White Hart Beeches	Sevenoaks	Natural & Semi Natural	7477.22	0.75
310	Battle of Solefields Site	Sevenoaks	Amenity Greenspace	7900.41	0.79
287	Sylvestres AGS	Sevenoaks	Amenity Greenspace	8148.27	0.81
306	Sevenoaks Clarendon Tennis Club	Sevenoaks	Outdoor Sports Facility	8234.65	0.82
304	St Nicholas Cemetery	Sevenoaks	Cemeteries and Churchyards	8620.48	0.86
1012	Longford Meadow AGS	Sevenoaks	Amenity Greenspace	8736.94	0.87
2042	AGS West Of Longford Bridges	Sevenoaks	Amenity Greenspace	8874.34	0.89
335	Bourchier Close Hill	Sevenoaks	Natural & Semi Natural	10034.98	1.00 EN9
382	Julians Meadow AGS	Sevenoaks	Amenity Greenspace	10624.27	1.06 EN9
567	Walthamstow Hall School	Sevenoaks	Outdoor Sports Facility	10769.12	1.08
293	Pontoise Close	Sevenoaks	Natural & Semi Natural	11316.24	1.13 EN9
331	Hollybush Lane Recreation Ground	Sevenoaks	Outdoor Sports Facility	11901.12	1.19 EN9
336	Kippington Meadow	Sevenoaks	Amenity Greenspace	11920.20	1.19 EN9
329	Sevenoaks Hockey Club	Sevenoaks	Outdoor Sports Facility	12837.56	1.28
292	Pontoise Close Open Space	Sevenoaks	Amenity Greenspace	14823.97	1.48 EN9
615	Chevening Allotments	Sevenoaks	Allotments and Community Gardens	15084.32	1.51
283	Holmesdale Cricket and Bowls Club	Sevenoaks	Outdoor Sports Facility	17639.89	1.76
330	Hollybush Lane Recreation Ground AGS	Sevenoaks	Amenity Greenspace	18624.31	1.86 EN9
333	Knole Environmental park	Sevenoaks	Parks and Gardens	18710.12	1.87
325	Vine Cricket Ground	Sevenoaks	Outdoor Sports Facility	19925.78	1.99 EN9
285	Chipstead Common	Sevenoaks	Amenity Greenspace	20083.02	2.01 EN9
337	Oak Hill NSN (Also on Map 25)	Sevenoaks	Natural & Semi Natural	28733.95	2.87 EN9
298	Bradbourne Lakes Park	Sevenoaks	Parks and Gardens	29815.09	2.98 EN9

552	Millpond Wood	Sevenoaks	Natural & Semi Natural	34283.54	3.43 EN9
563	Sevenoaks County Primary School	Sevenoaks	Outdoor Sports Facility	34981.81	3.50 EN9
218	Greatness Park Cemetery	Sevenoaks	Cemeteries and Churchyards	38020.98	3.80
322	Solefields Playing Fields	Sevenoaks	Outdoor Sports Facility	38075.76	3.81
569	Quakers Hall Allotments	Sevenoaks	Allotments and Community Gardens	46061.39	4.61 EN9
328	Raley's Field and Knole Paddock	Sevenoaks	Outdoor Sports Facility	51472.74	5.15
187	Rye Wood	Sevenoaks	Natural & Semi Natural	56114.84	5.61
308	Sevenoaks School A	Sevenoaks	Outdoor Sports Facility	65429.66	6.54
309	Sevenoaks School B (extends to map 25)	Sevenoaks	Outdoor Sports Facility	172739.63	17.27
197	Chipstead Lake	Sevenoaks	Natural & Semi Natural	325890.07	32.59
235	Knole Park	Sevenoaks	Parks and Gardens	2666089.23	266.61
192	London Road AGS	Sevenoaks	Amenity Greenspace	1156.48	0.12 EN9
188	Station Road AGS	Sevenoaks	Amenity Greenspace	1691.68	0.17 EN9
191	London Road AGS	Sevenoaks	Amenity Greenspace	1747.21	0.17 EN9
554	The Green	Sevenoaks	Amenity Greenspace	1368.10	0.14 EN9
2047	Mill Lane Pond	Sevenoaks	Natural & Semi Natural	1773.94	0.18 EN9
556	Hillingdon Avenue AGS B	Sevenoaks	Amenity Greenspace	1902.85	0.19 EN9
557	Hillingdon Avenue AGS C	Sevenoaks	Amenity Greenspace	449.14	0.04 EN9
558	Hillingdon Avenue AGS D	Sevenoaks	Amenity Greenspace	363.56	0.04 EN9
559	Hillingdon Avenue AGS E	Sevenoaks	Amenity Greenspace	497.17	0.05 EN9
237	Long Road Village Green	Sevenoaks Weald	Amenity Greenspace	8498.12	0.85 EN9
241	Weald Allotments	Sevenoaks Weald	Allotments and Community Gardens	16795.07	1.68
669	Mildmay Place	Shoreham	Amenity Greenspace	2119.97	0.21
739	Top Paddock AGS	South Darent	Amenity Greenspace	2448.73	0.24 EN9
738	Lower Paddock AGS	South Darent	Amenity Greenspace	3468.87	0.35 EN9
740	Shrubbery Road Green	South Darent	Amenity Greenspace	3892.35	0.39 EN9
41	Lilac Gardens	Swanley	Amenity Greenspace	1957.46	0.20 EN9
73	Northview AGS	Swanley	Amenity Greenspace	2031.82	0.20 EN9
133	Ellis Close NSN	Swanley	Natural & Semi Natural	2118.45	0.21
63	Conifer Way	Swanley	Amenity Greenspace	2118.86	0.21
65	Walnut Way	Swanley	Amenity Greenspace	2183.50	0.22
76	Hilda Way Avenue Woodlands B	Swanley	Natural & Semi Natural	2248.93	0.22 EN9
167	Pine Close Pond	Swanley	Natural & Semi Natural	2307.30	0.23 EN9
131	Swanley Rec Ground Play Area	Swanley	Young People and Children	2759.59	0.28 EN9
170	Downsview Primary School	Swanley	Outdoor Sports Facility	2936.37	0.29
106	Northview	Swanley	Amenity Greenspace	3063.44	0.31
71	White Oak Leisure Centre	Swanley	Amenity Greenspace	3358.84	0.34

42	Reeves Crescent	Swanley	Amenity Greenspace	3389.13	0.34 EN9
1124	Pine Close AGS	Swanley	Amenity Greenspace	3533.97	0.35 EN9
157	Glendale GC	Swanley	Green Corridor	3559.88	0.36 EN9
58	Nursery Close	Swanley	Amenity Greenspace	3895.56	0.39
138	High Street AGS	Swanley	Amenity Greenspace	3903.71	0.39 EN9
1147	West View Green Space	Swanley	Amenity Greenspace	4304.78	0.43
140	High Firs County Primary School	Swanley	Outdoor Sports Facility	4593.00	0.46
130	Morello Close AGS	Swanley	Amenity Greenspace	4604.58	0.46 EN9
110	Bartholomew Way Park	Swanley	Parks and Gardens	4993.30	0.50 EN9
90	Archer Way	Swanley	Amenity Greenspace	5057.12	0.51 EN9
77	Garden Close NSN	Swanley	Natural & Semi Natural	5898.90	0.59 EN9
75	Hilda Way Avenue Woodlands	Swanley	Natural & Semi Natural	6136.54	0.61 EN9
70	Shurlock Avenue	Swanley	Amenity Greenspace	6458.68	0.65 EN9
68	Alder Way AGS A	Swanley	Amenity Greenspace	6874.52	0.69 EN9
111	St Marys Church	Swanley	Cemeteries and Churchyards	7469.47	0.75
109	St Barts Primary School	Swanley	Outdoor Sports Facility	8255.82	0.83 EN9
40	Swanley Secondary School	Swanley	Outdoor Sports Facility	8720.69	0.87
43	Farm Avenue	Swanley	Natural & Semi Natural	10266.14	1.03 EN9
173	Petham Park	Swanley	Amenity Greenspace	11098.12	1.11 EN9
135	St Marys COE Primary School	Swanley	Outdoor Sports Facility	11234.36	1.12 EN9
103	White Oak County Primary School	Swanley	Outdoor Sports Facility	14017.48	1.40 EN9
158	Pinks Hill AGS	Swanley	Amenity Greenspace	18322.94	1.83 EN9
136	Swanley Recreation Ground	Swanley	Outdoor Sports Facility	29539.12	2.95 EN9
108	Bonney Way AGS	Swanley	Amenity Greenspace	1827.21	0.18 EN9
48	Hart Dyke Crescent	Swanley	Amenity Greenspace	1471.61	0.15 EN9
1126	Beech Avenue AGS	Swanley	Amenity Greenspace	1622.84	0.16 EN9
156	Glendale Pond	Swanley	Natural & Semi Natural	845.08	0.08 EN9
2034	Western AGS Millfield Road	West Kingsdown	Amenity Greenspace	2642.15	0.26
755	Hever Avenue Recreation Ground	West Kingsdown	Amenity Greenspace	3125.54	0.31 EN9
2039	Four Acre Wood	West Kingsdown	Natural & Semi Natural	13533.81	1.35
753	Millfield Road AGS	West Kingsdown	Amenity Greenspace	1649.45	0.16 EN9
589	Granville Road AGS	Westerham	Amenity Greenspace	3507.88	0.35 EN9
585	St Mary's Churchyard	Westerham	Cemeteries and Churchyards	8952.77	0.90
578	Farleycroft Allotments	Westerham	Allotments and Community Gardens	9948.84	0.99
587	Currant Hill Allotments	Westerham	Allotments and Community Gardens	19315.67	1.93
586	The Green	Westerham	Amenity Greenspace	1700.12	0.17 EN9



Legend

-  SDC Boundary
-  EN9 Important Area of Greenspace
-  EN9 Site to be Removed
-  Metropolitan Green Belt
- Open Spaces Study ≥ 0.2 ha**
-  Allotments and Community Gardens
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-  Cemeteries and Churchyards
-  Green Corridor
-  Natural & Semi Natural
-  Outdoor Sports Facility
-  Parks and Gardens
-  Young People and Children Space

Edenbridge

Open Spaces Study

Scale: 1:5,000

Date: August 2011

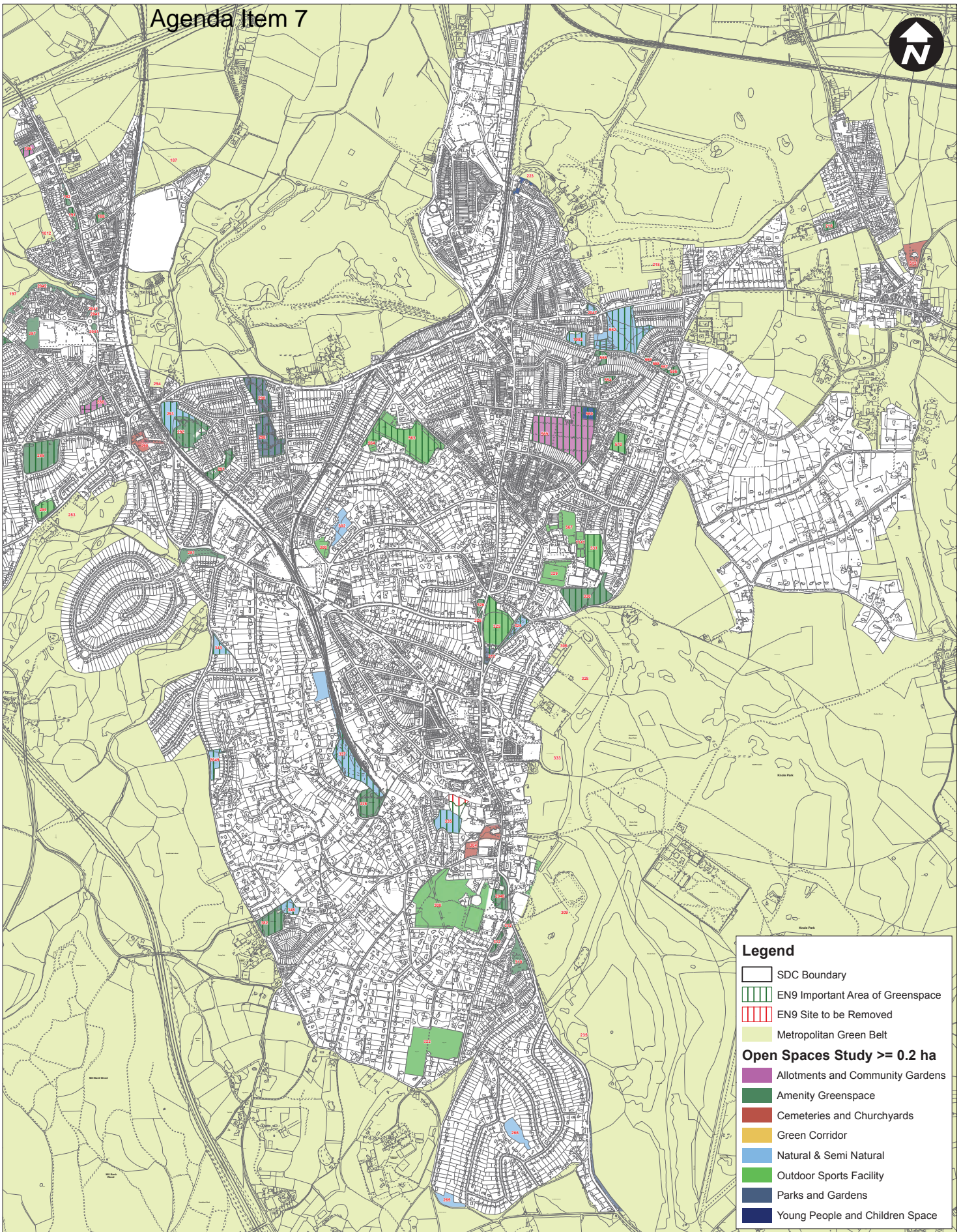
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Areas over 2000sqm within Urban Confines





See Riverhead Map 1



Legend

- SDC Boundary
- EN9 Important Area of Greenspace
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Sevenoaks

Open Spaces Study

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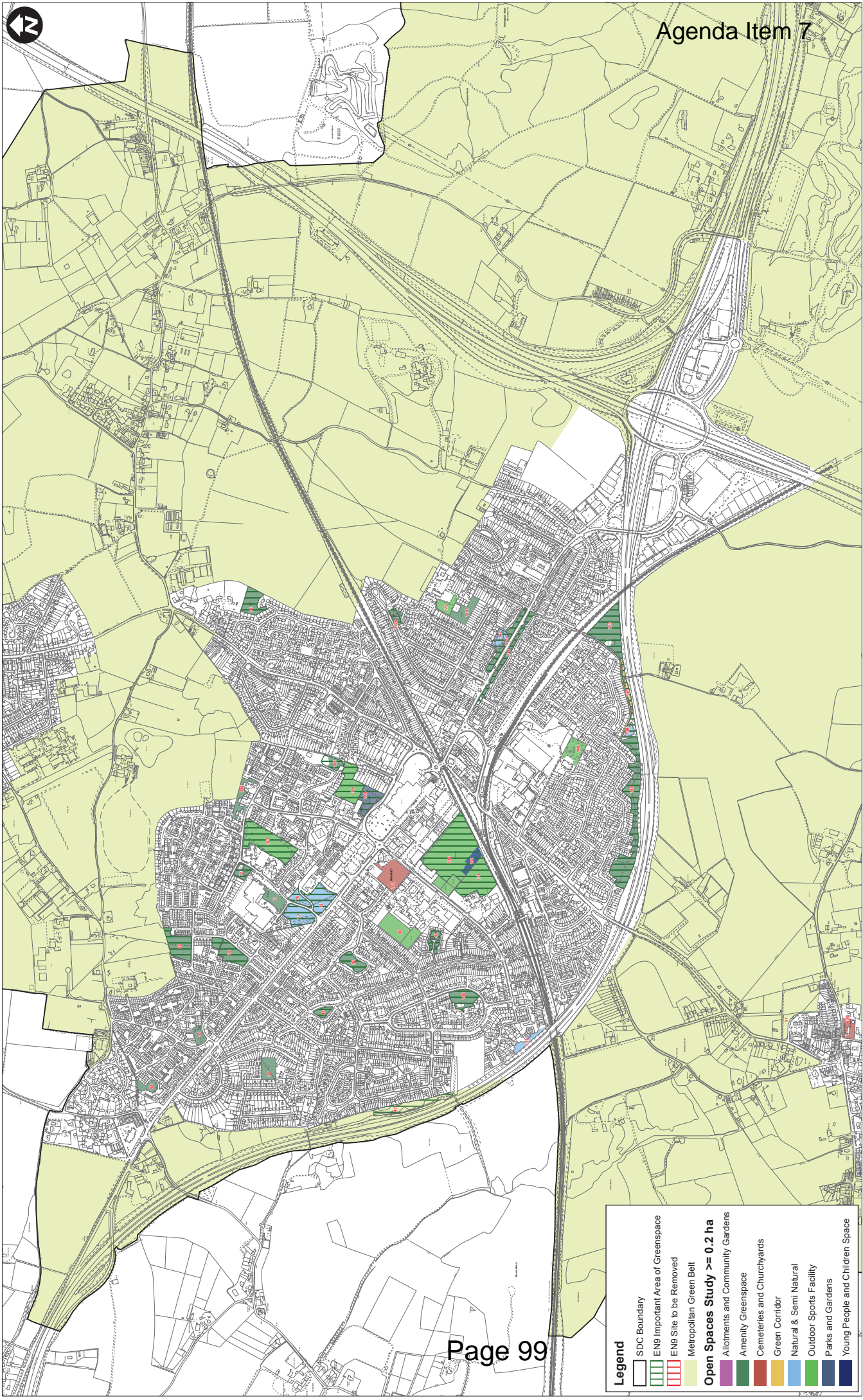
Areas over 2000sqm within Urban Confines

Scale: 1:8,000

Date: August 2011



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Legend	SDC Boundary
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Swanley

Open Spaces Study

Areas over 2000sqm within Urban Confines

Scale: 1:6,000
Date: August 2011



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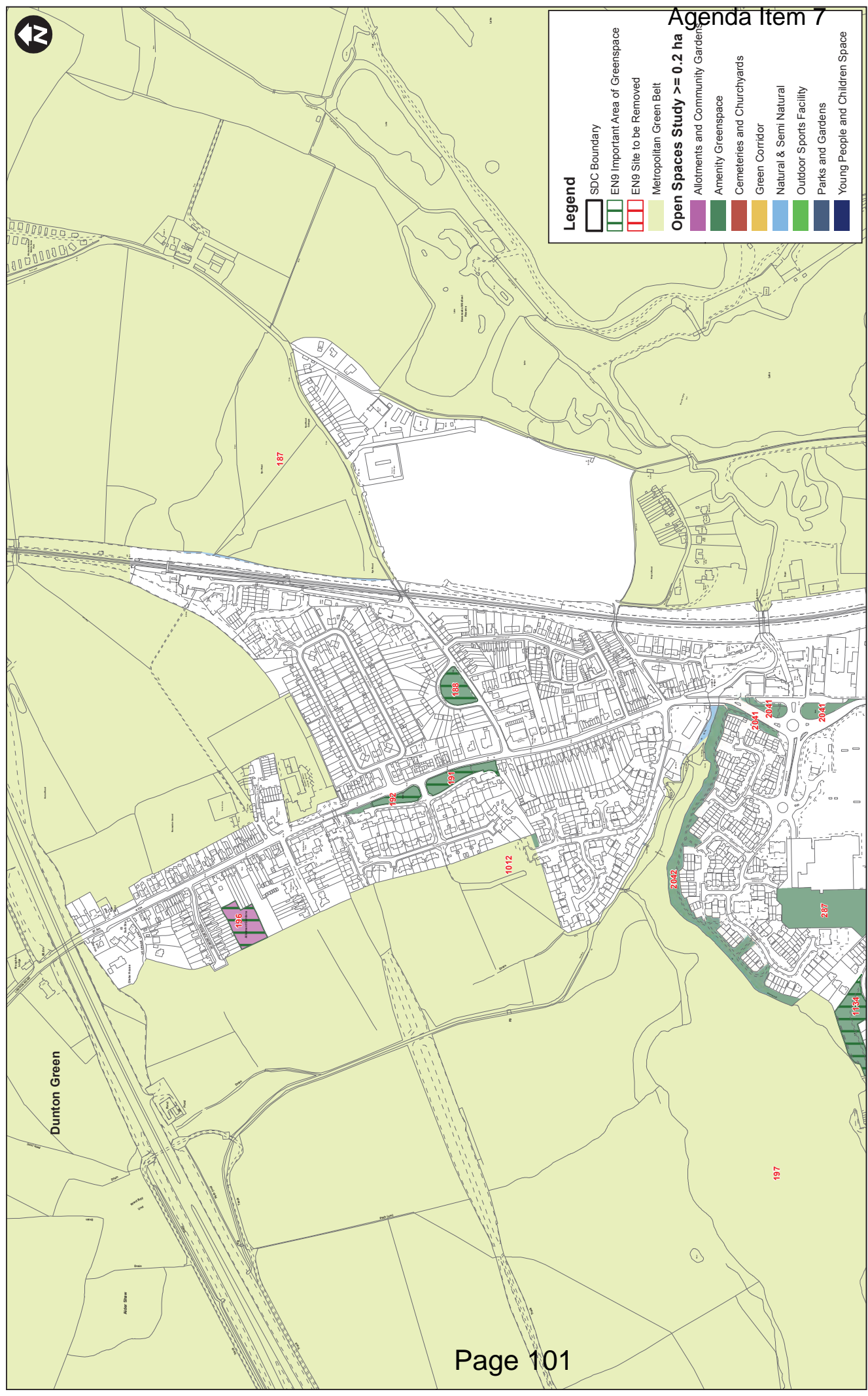
Agenda Item 7

Legend

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Dunton Green

Sevenoaks Urban Area (Dunton Green)

Open Spaces Study

Areas over 2000sqm within Urban Confines

Scale: 1:5,000
Date: August 2011

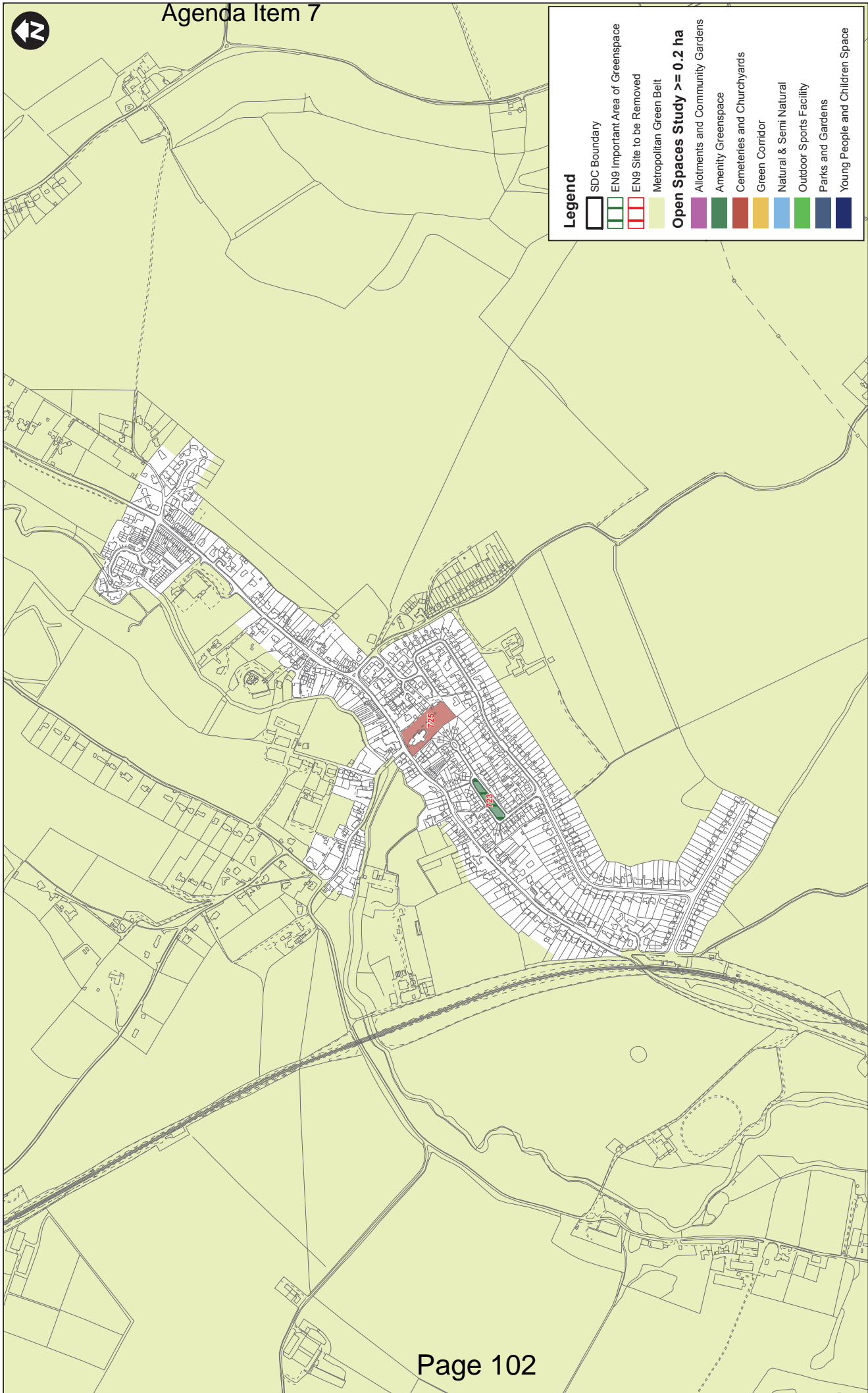
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Eynsford

Open Spaces Study

Areas over 2000sqm within Urban Confines

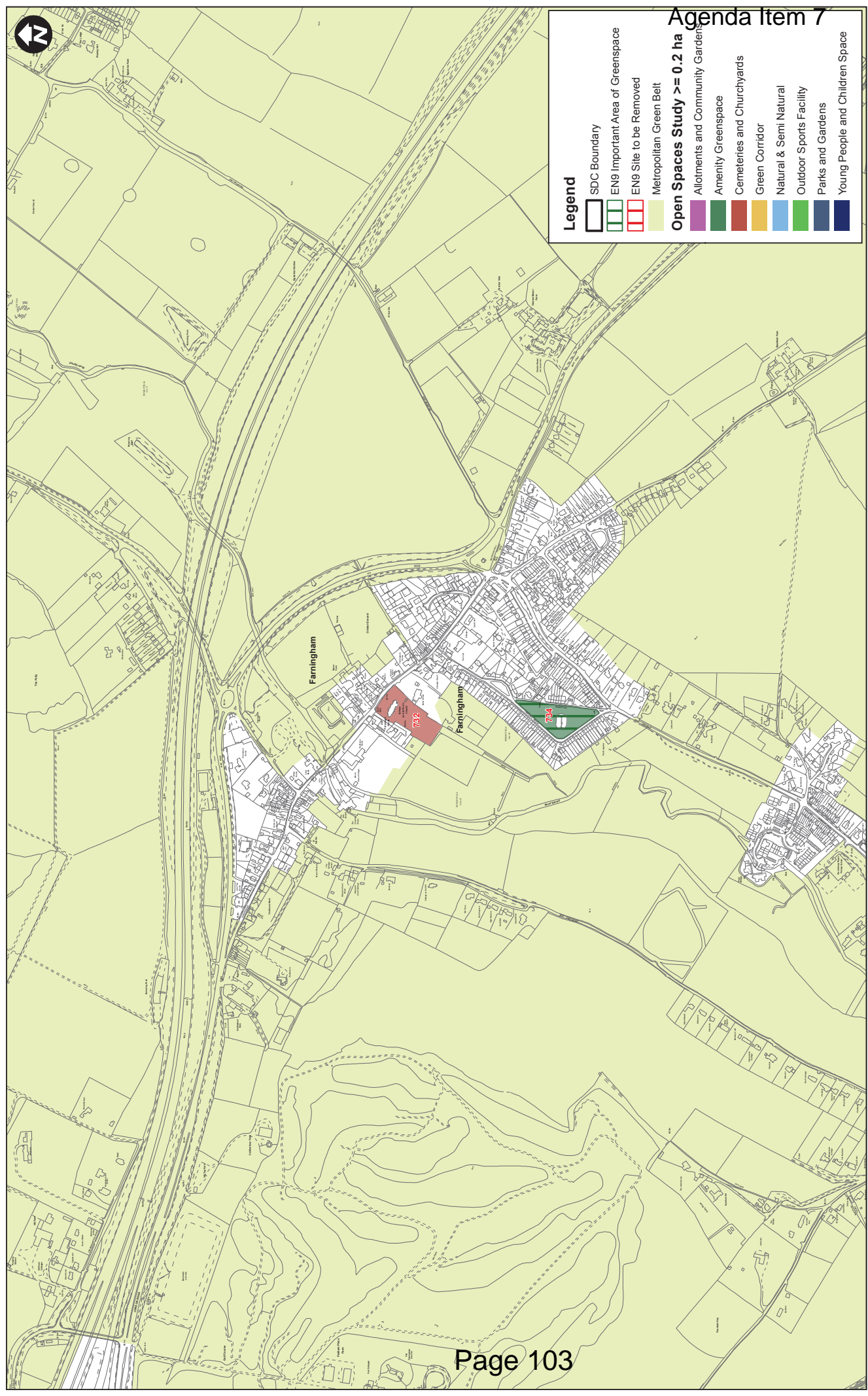
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Farningham

Farningham



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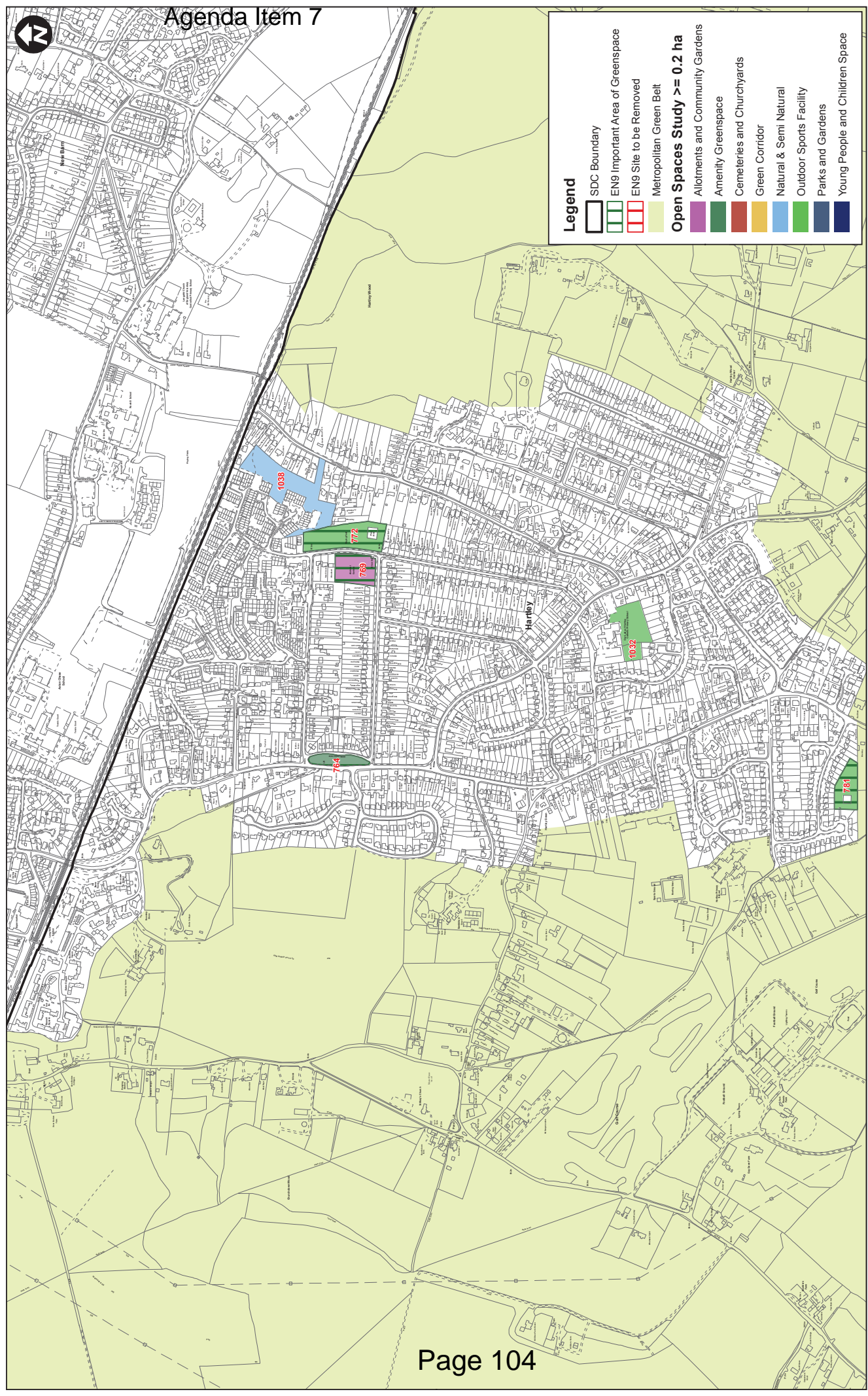
Farningham

Open Spaces Study

Areas over 2000sqm within Urban Confines

Scale: 1:7,500
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Date: August 2011

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Hartley

Open Spaces Study

Areas over 2000sqm within Urban Confines















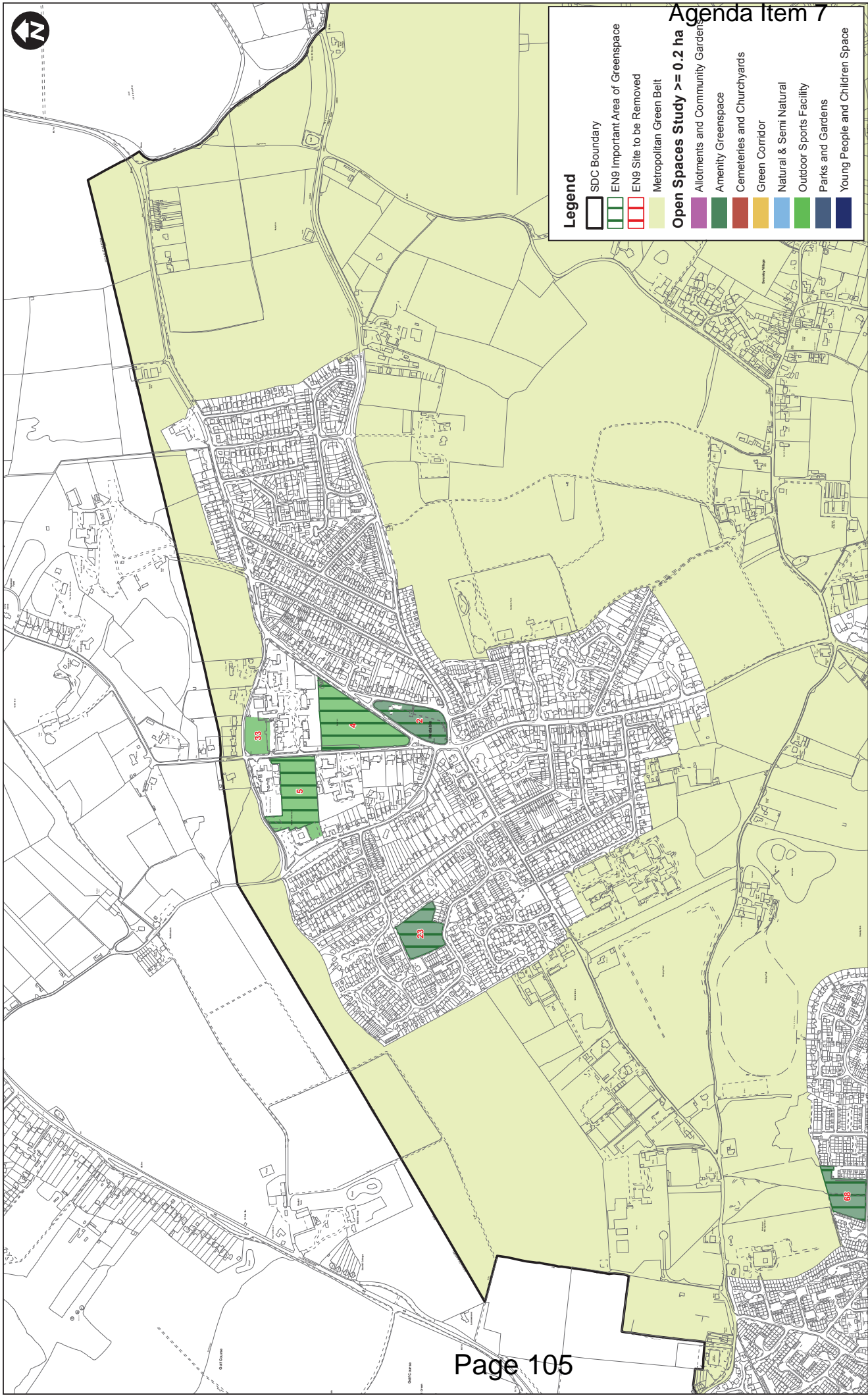
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Agenda Item 7

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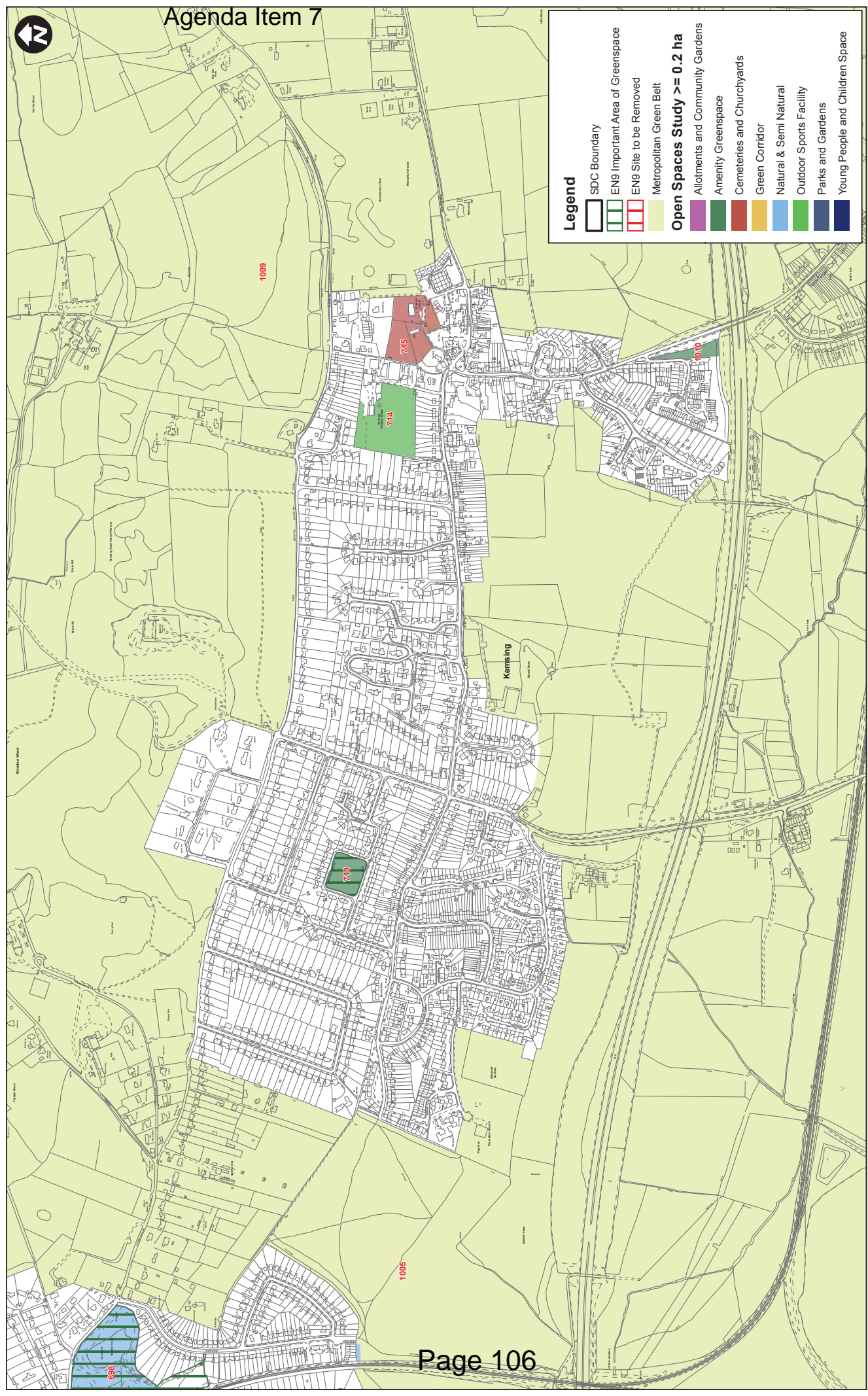
Hextable

Open Spaces Study

Areas over 2000sqm within Urban Confines



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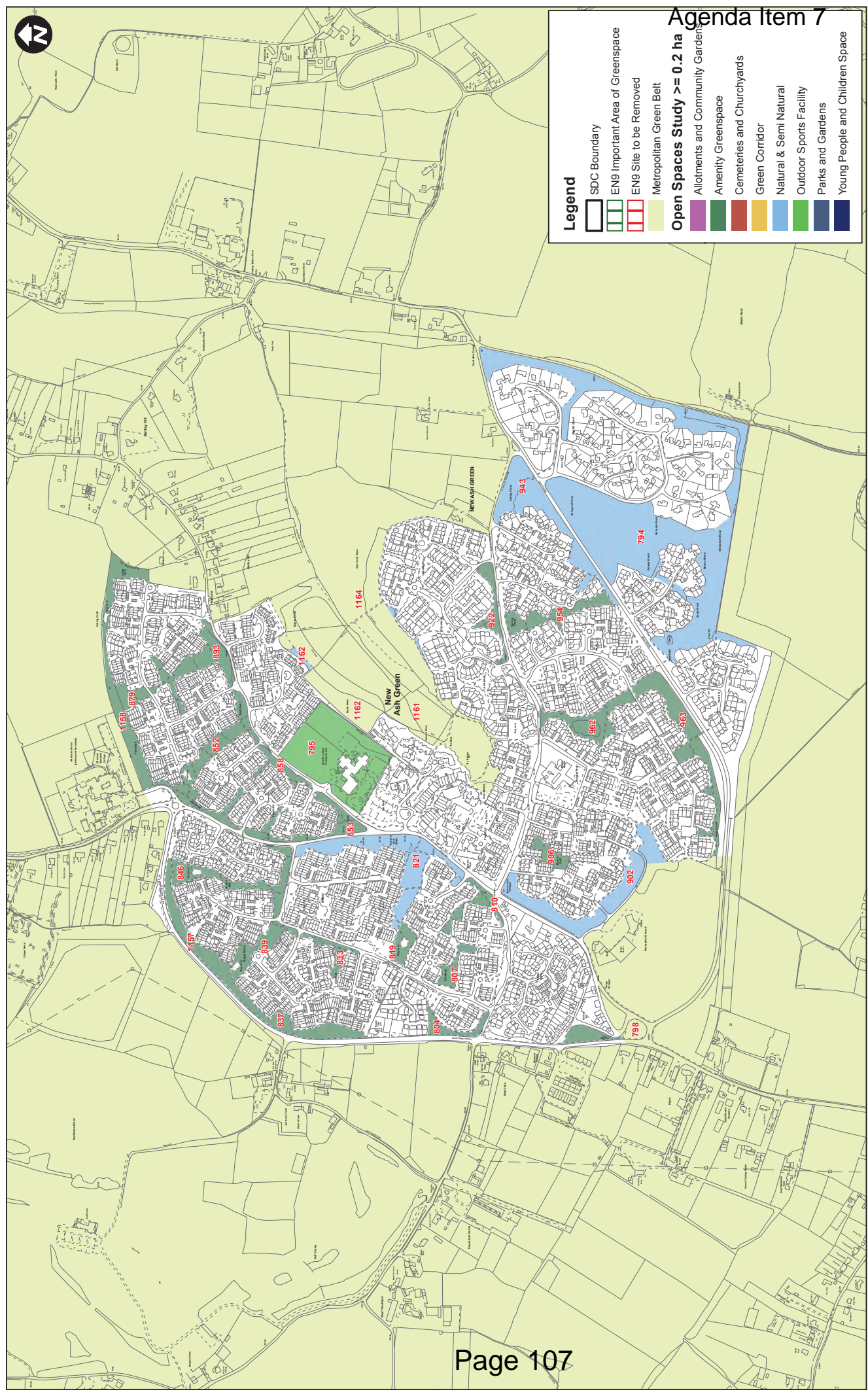


Legend

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Open Spaces Study >= 0.2 ha

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Agenda Item 7

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New Ash Green

Open Spaces Study

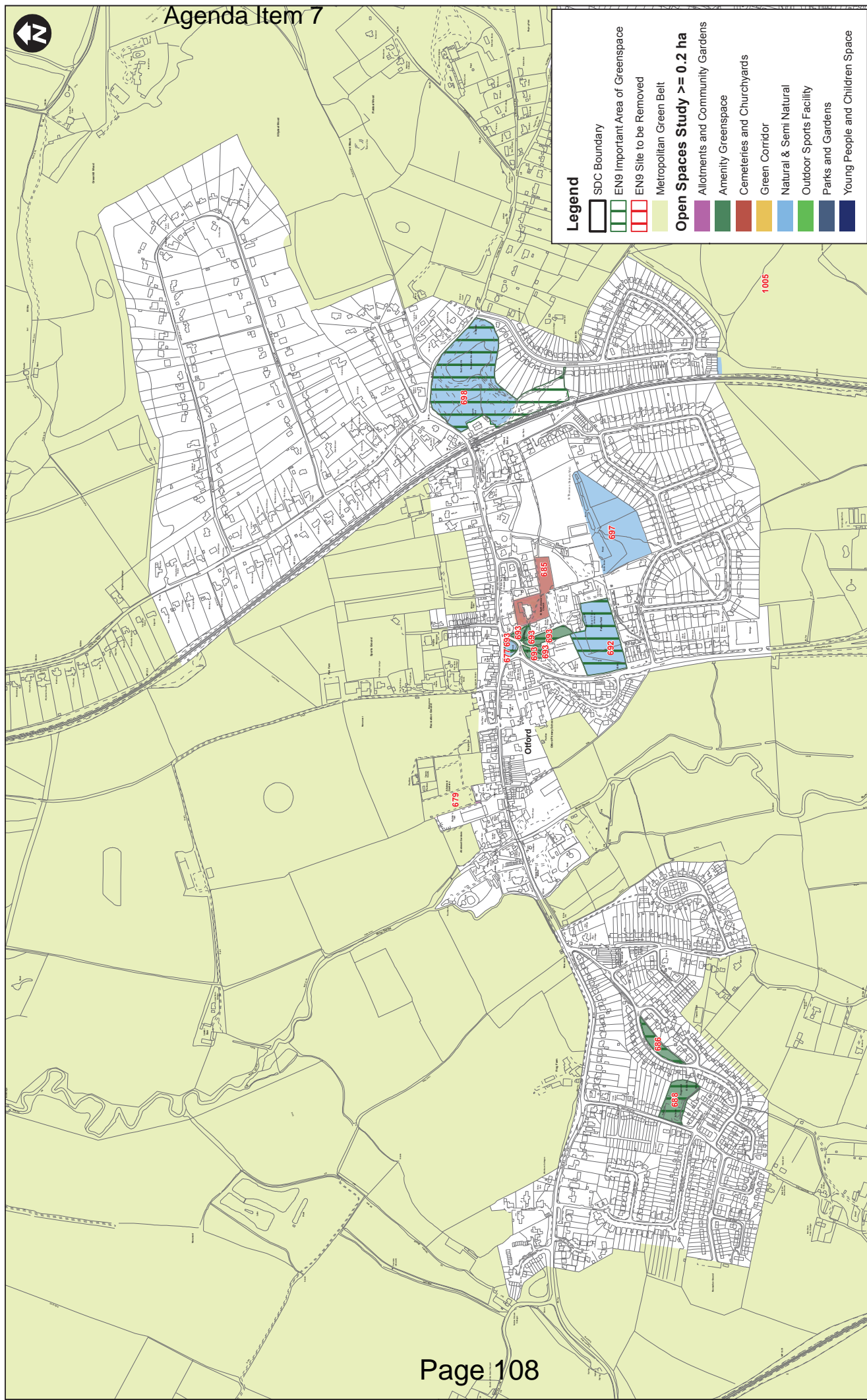
Areas over 2000sqm within Urban Confines

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Otford

Open Spaces Study

Areas over 2000sqm within Urban Confines

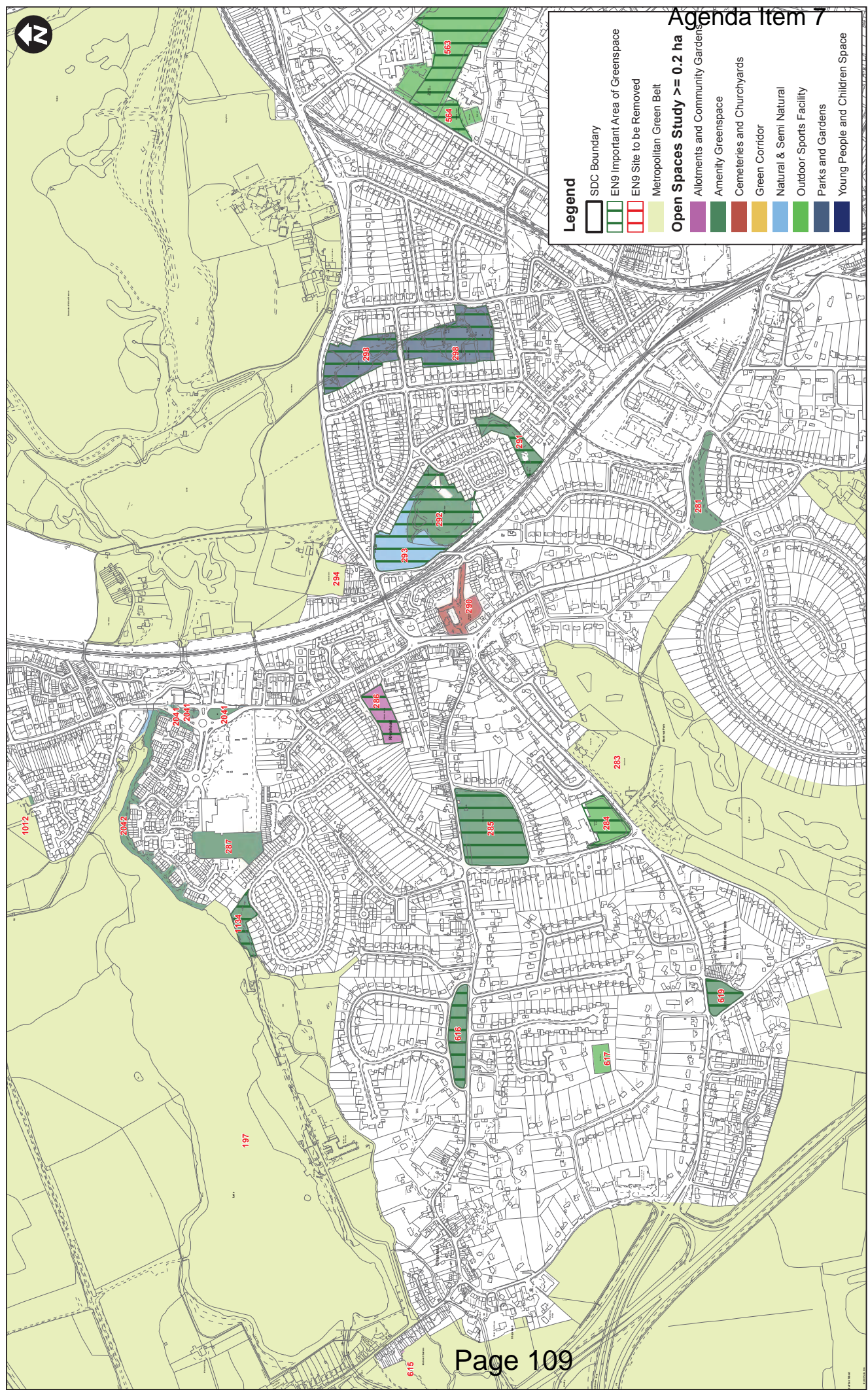


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Agenda Item 7

- Legend**
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Sevenoaks Urban Area (Riverhead)

Open Spaces Study

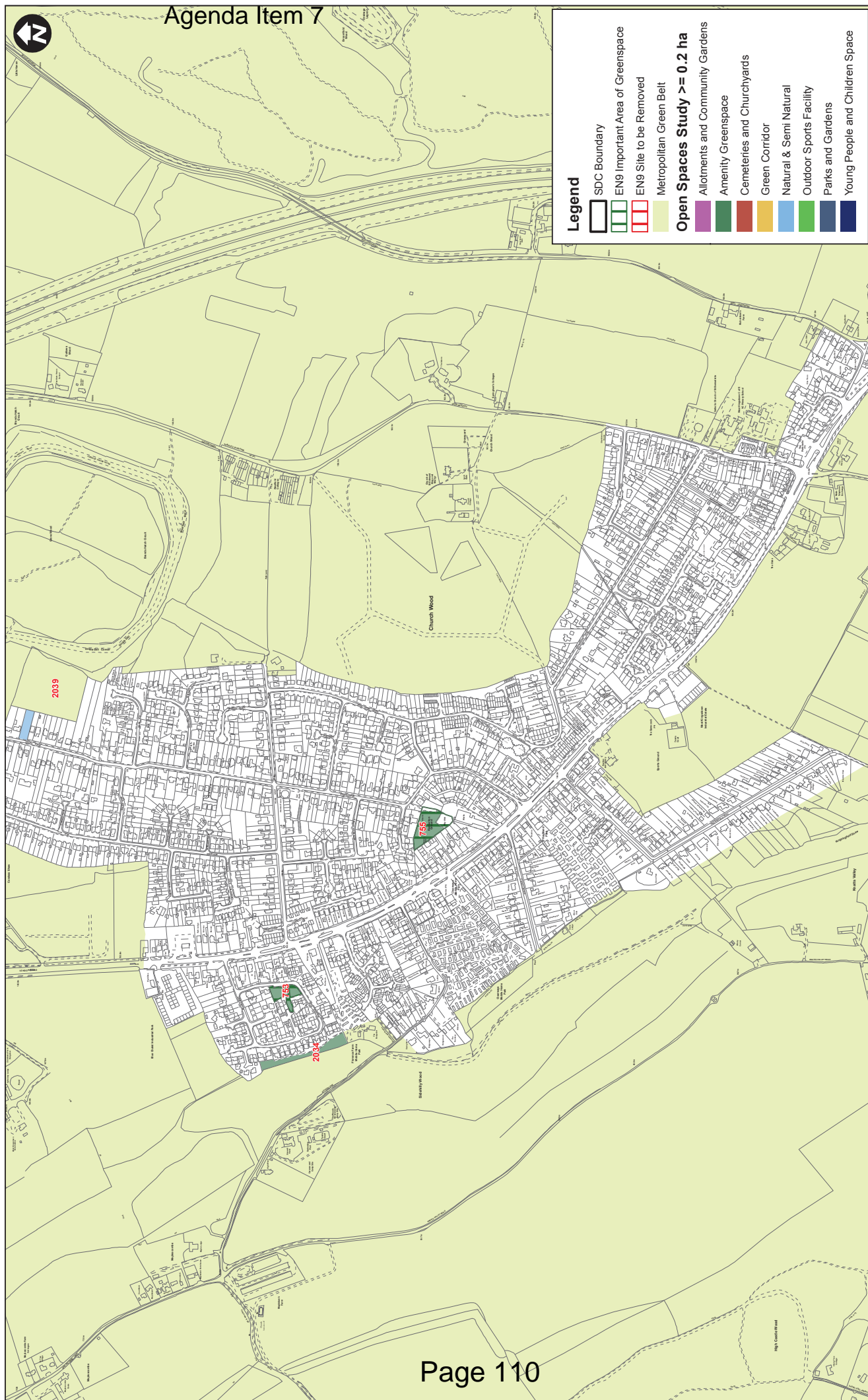
Areas over 2000sqm within Urban Confines

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Legend

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Open Spaces Study >= 0.2 ha

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West Kingsdown

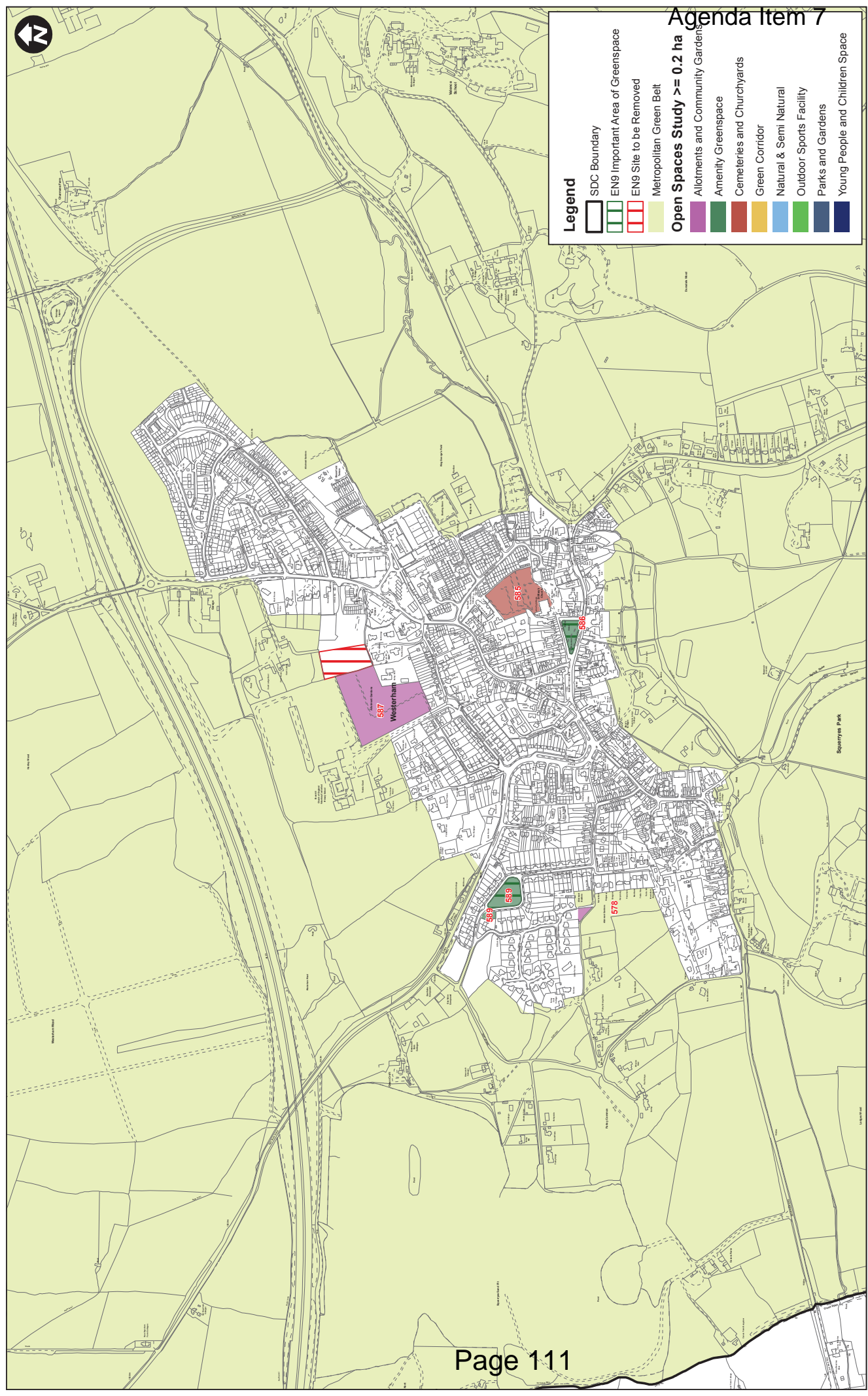
Open Spaces Study

Areas over 2000sqm within Urban Confines

Scale: 1:7,500

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Agenda Item 7

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Westerham

Open Spaces Study

Areas over 2000sqm within Urban Confines

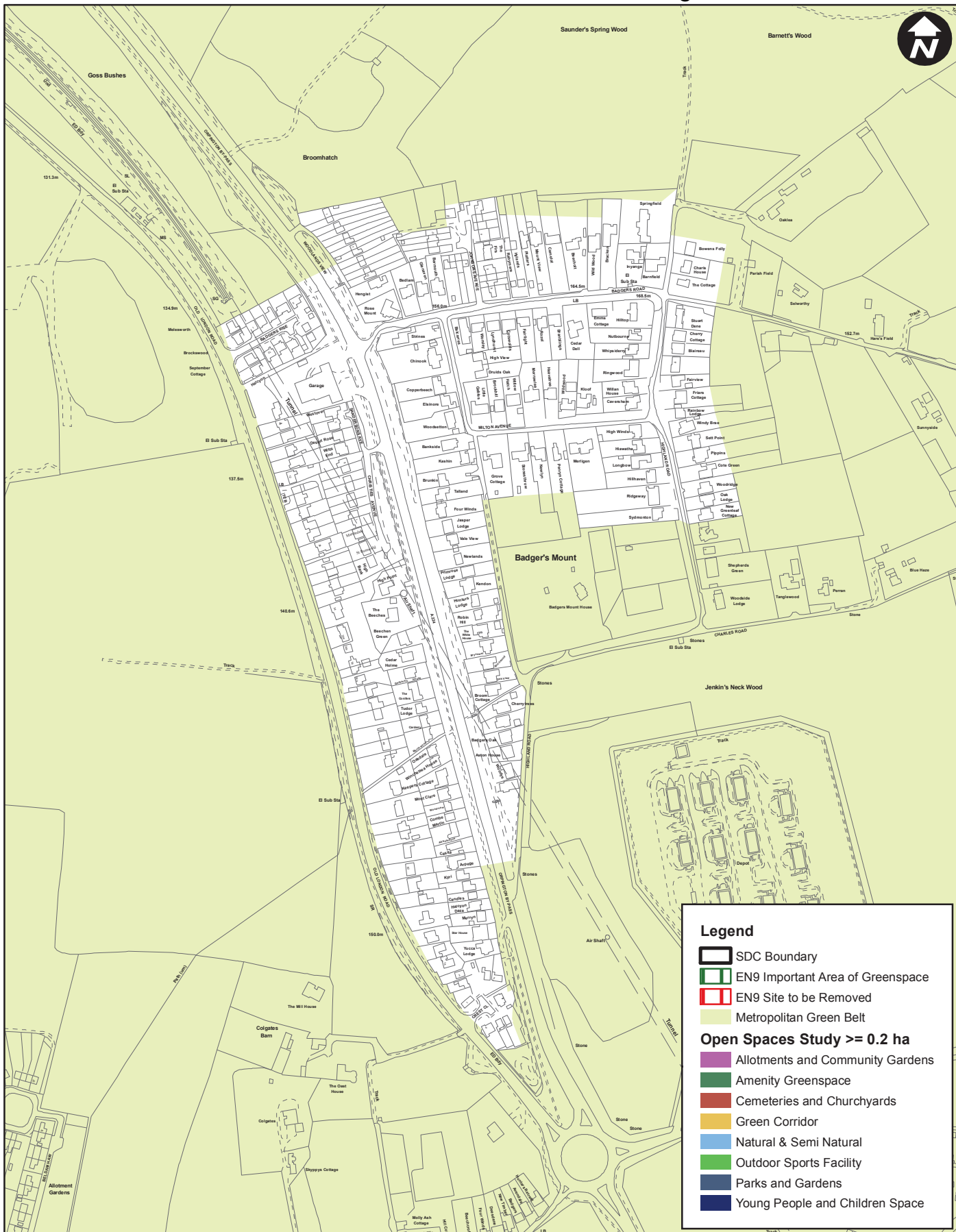
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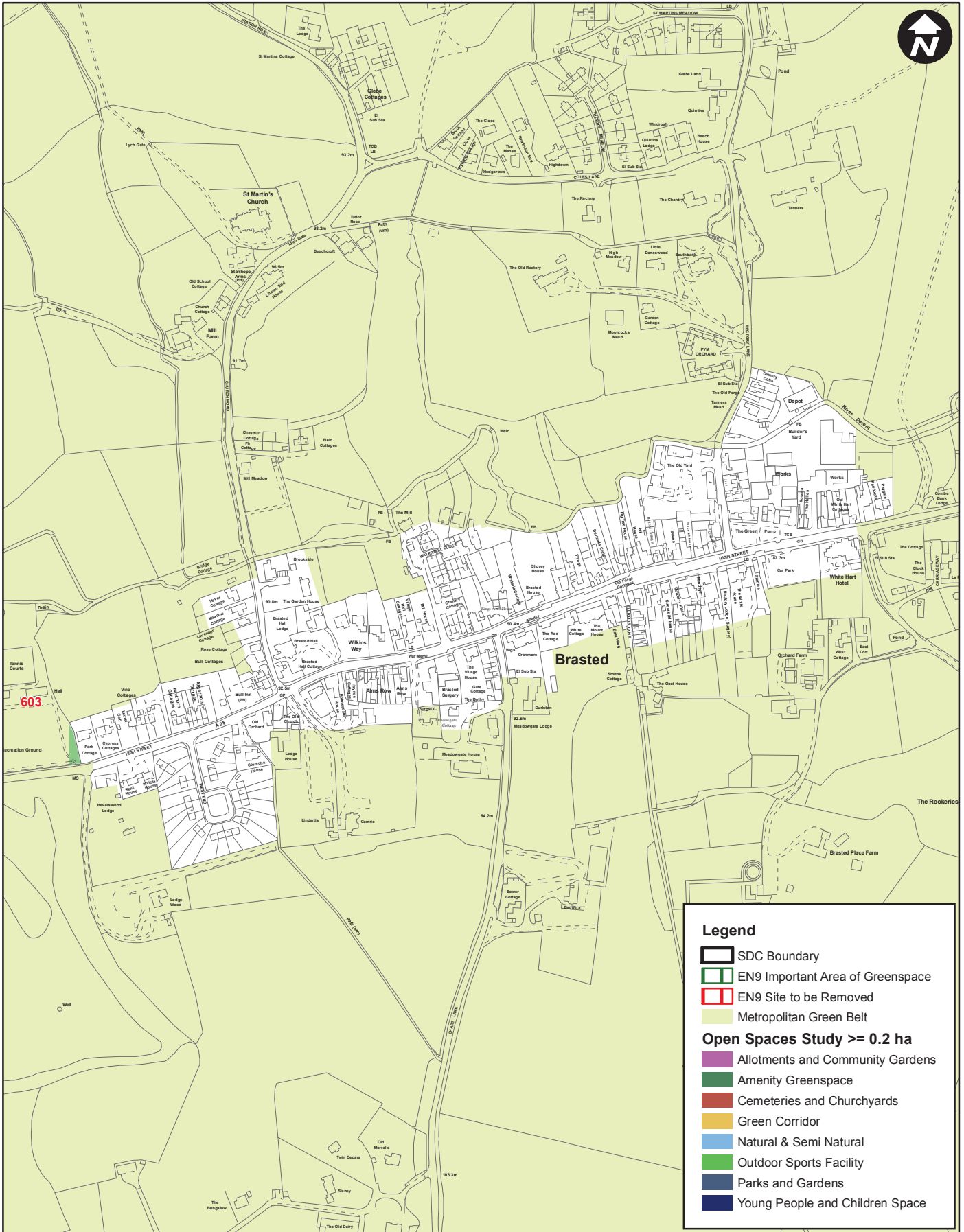


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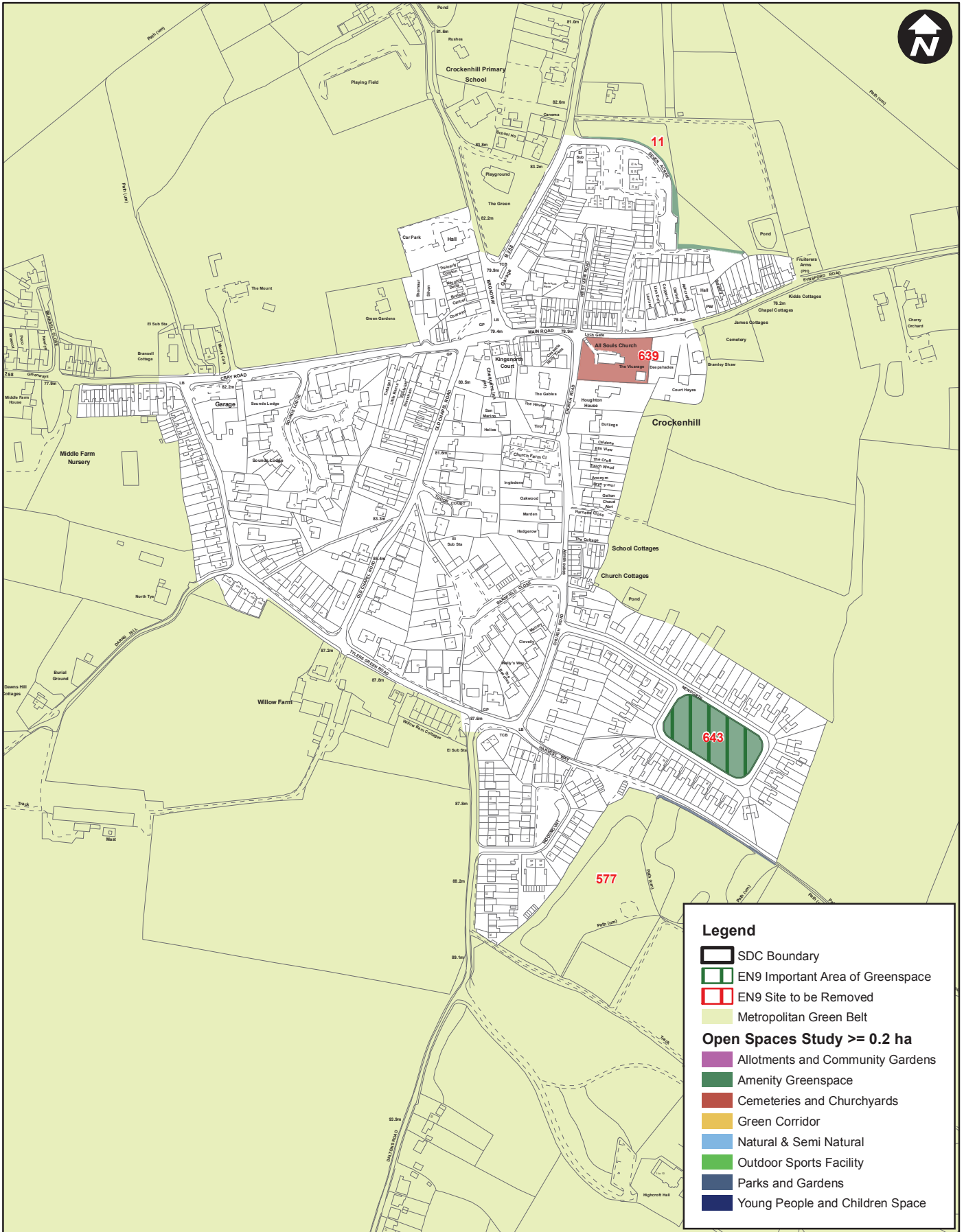
Open Spaces Study

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Date: August 2011

Page 114
Areas over 200sqm within Urban Confines

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Crockenhill

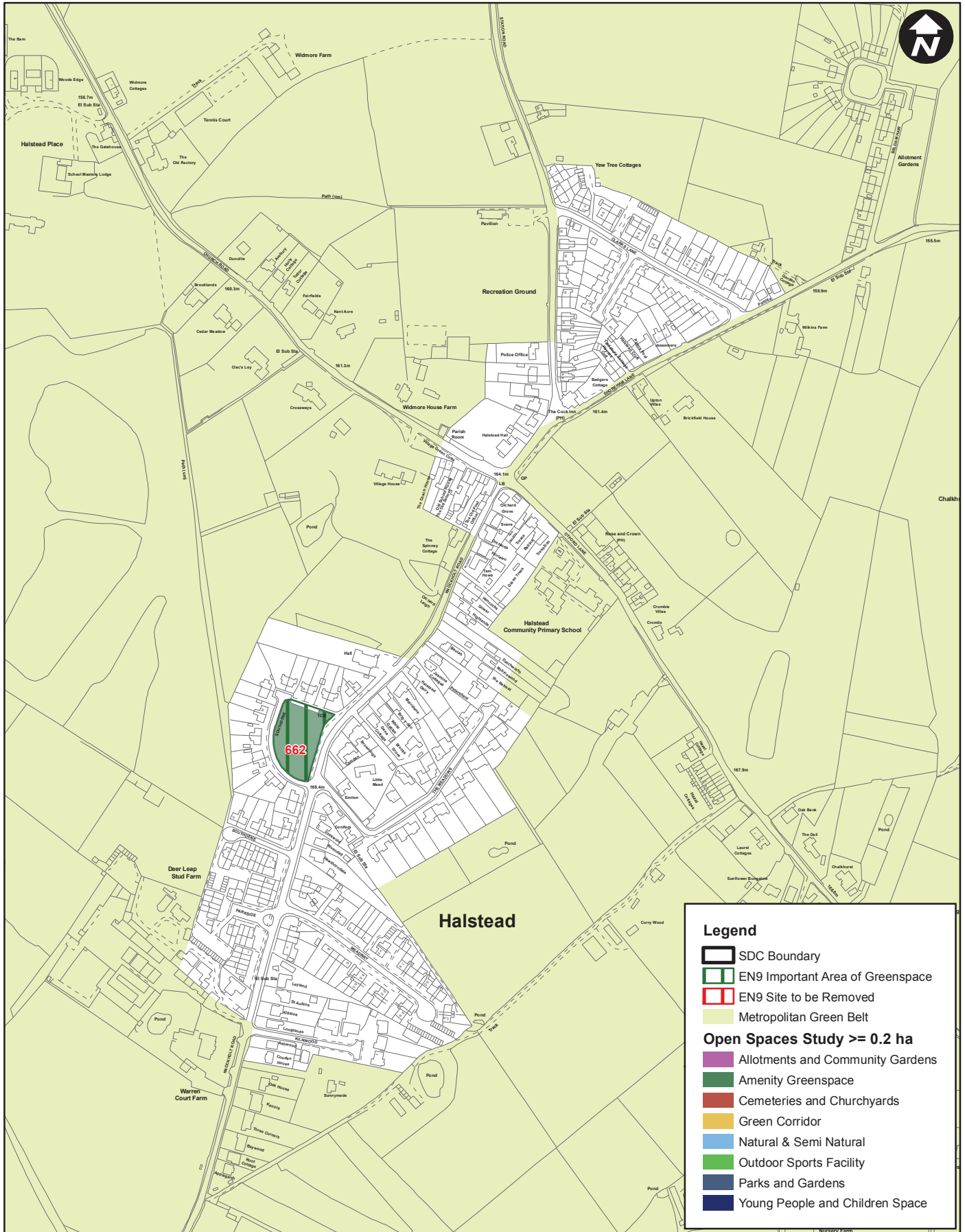
Open Spaces Study

Scale: 1:5,000

Date: August 2011

Areas over 2000sqm within Urban Confines

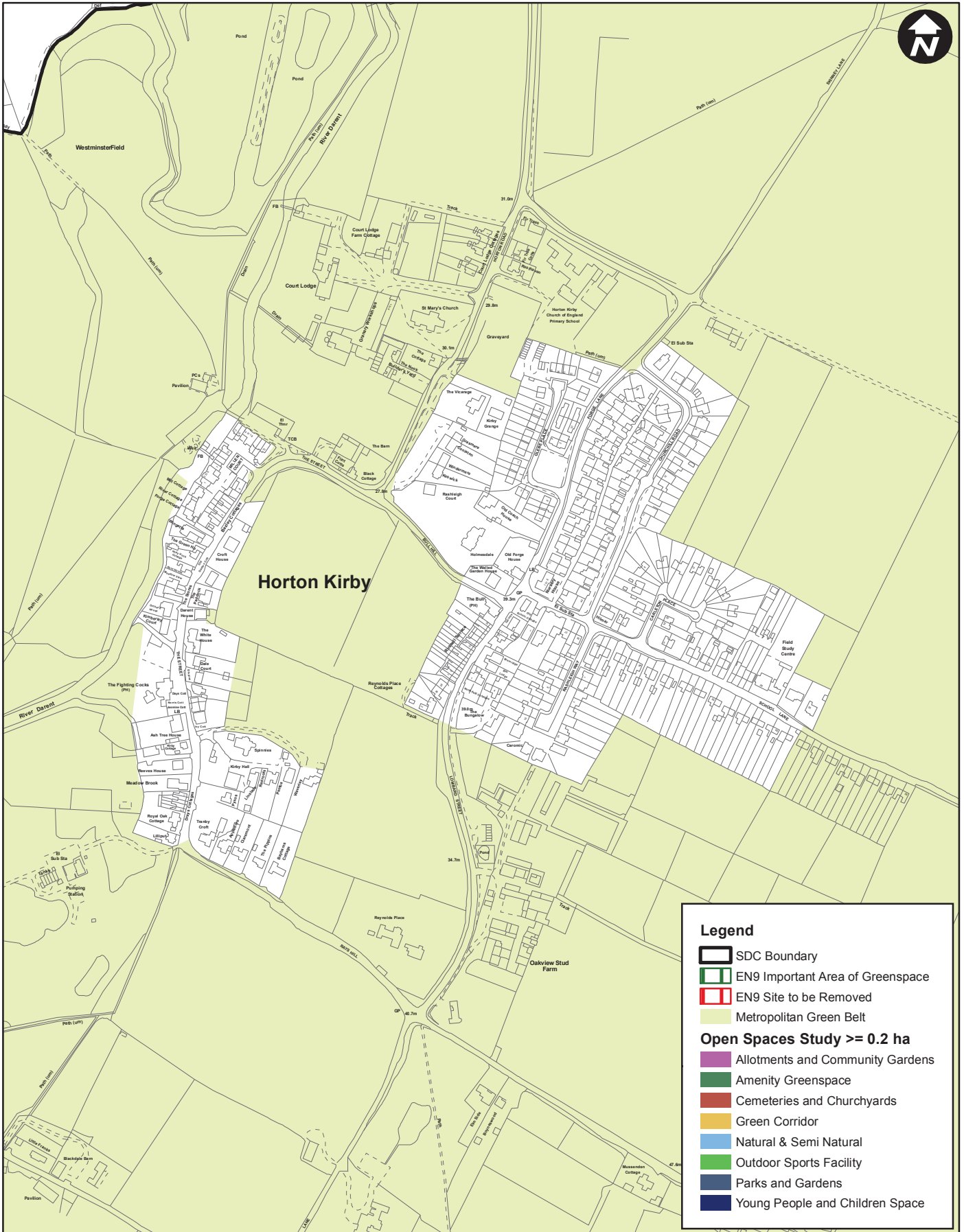
Agenda Item 7



Halstead
 Open Spaces Study
 Areas over 200sqm within Urban Confines

Scale: 1:5,000
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Legend

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Open Spaces Study >= 0.2 ha

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Horton Kirby

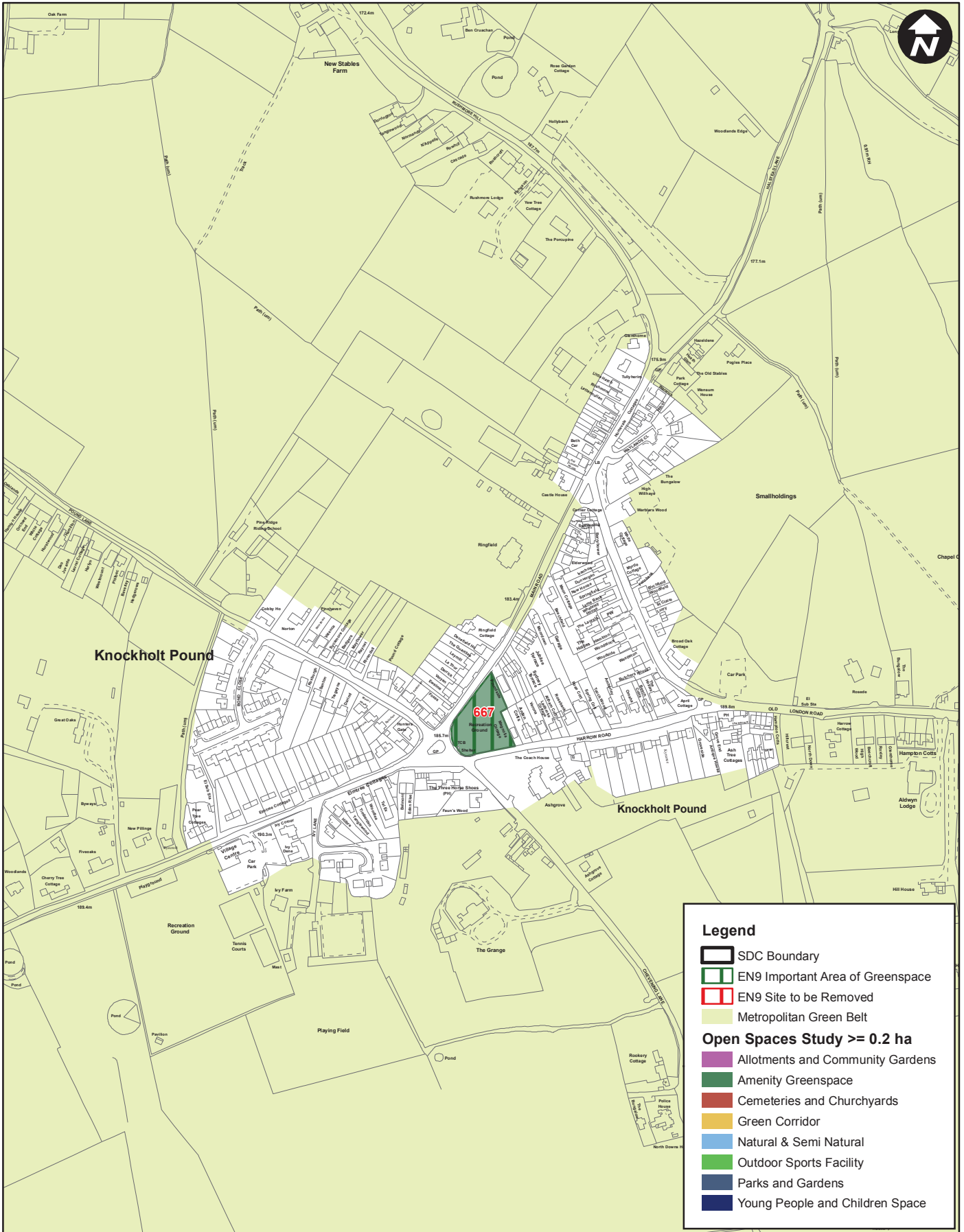
Open Spaces Study

Scale: 1:5,000

Date: August 2011

Areas over 2000sqm within Urban Confines

Agenda Item 7



Knockholt

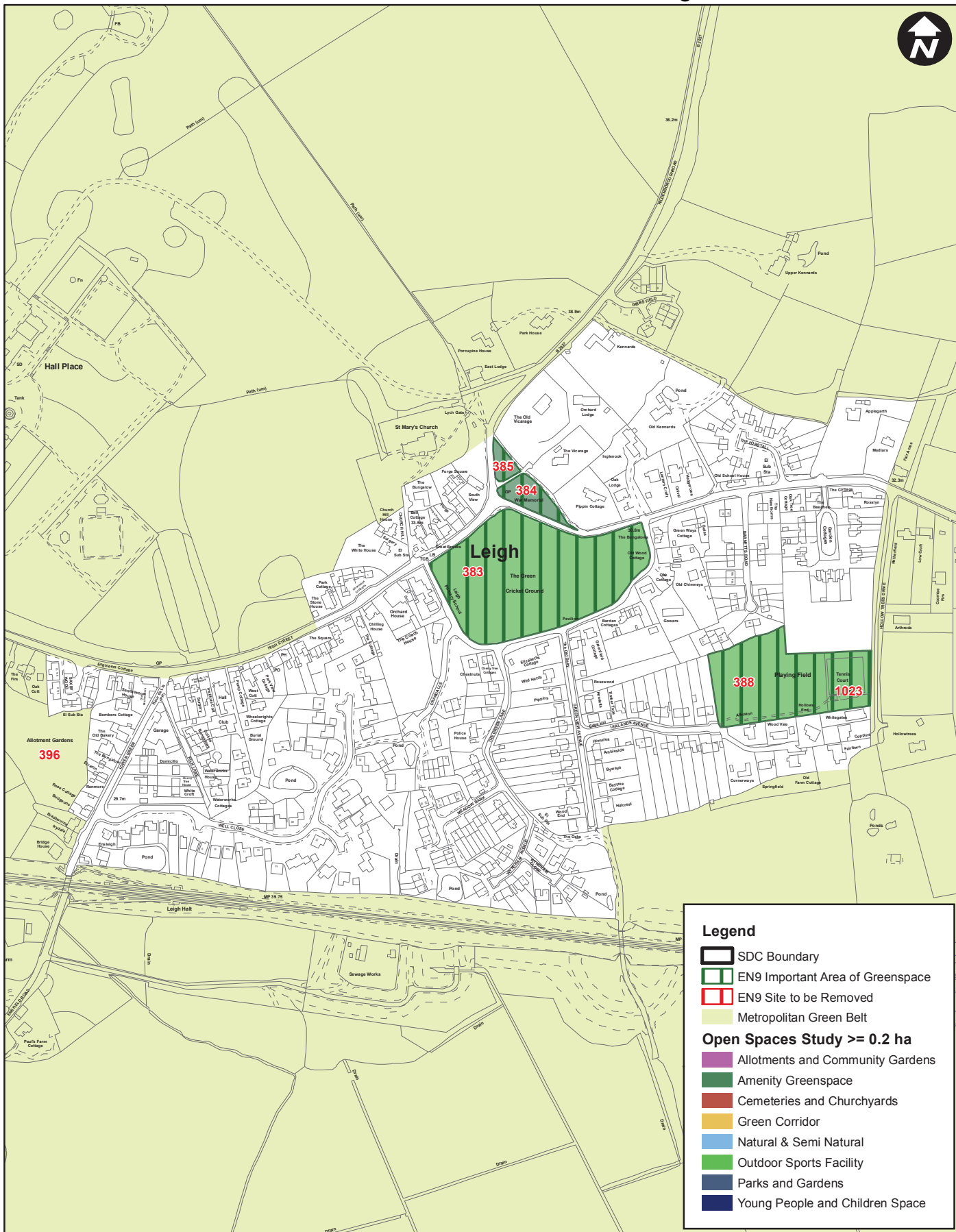
Open Spaces Study

Scale: 1:5,000

Date: August 2011

Page 118
Areas over 200sqm within Urban Confines

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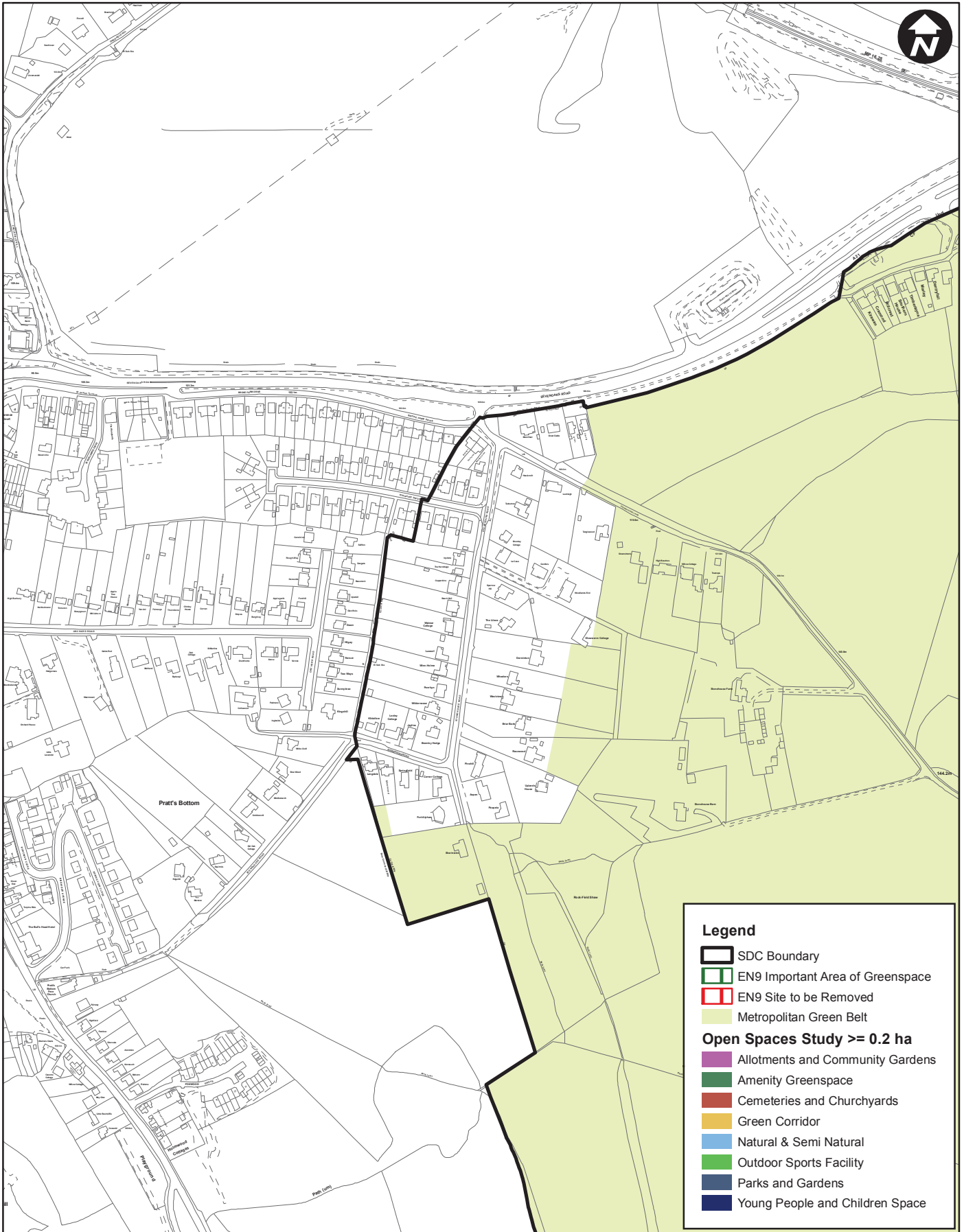


Leigh
 Open Spaces Study
 Areas over 2000sqm within Urban Confines

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Agenda Item 7



Legend

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Open Spaces Study >= 0.2 ha

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Pratts Bottom

Open Spaces Study

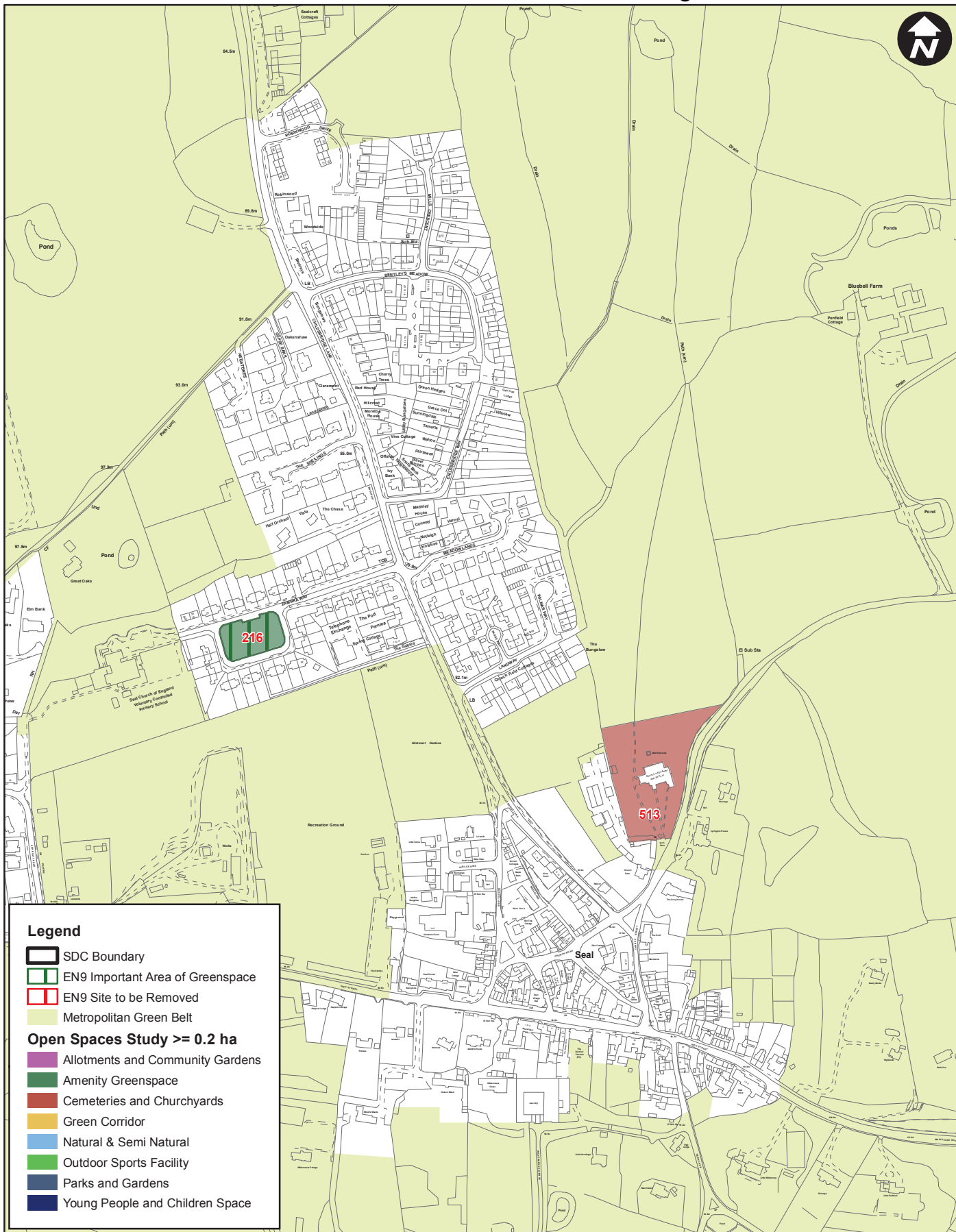
Scale: 1:5,000

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Areas over 200sqm within Urban Confines



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Legend

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Open Spaces Study >= 0.2 ha

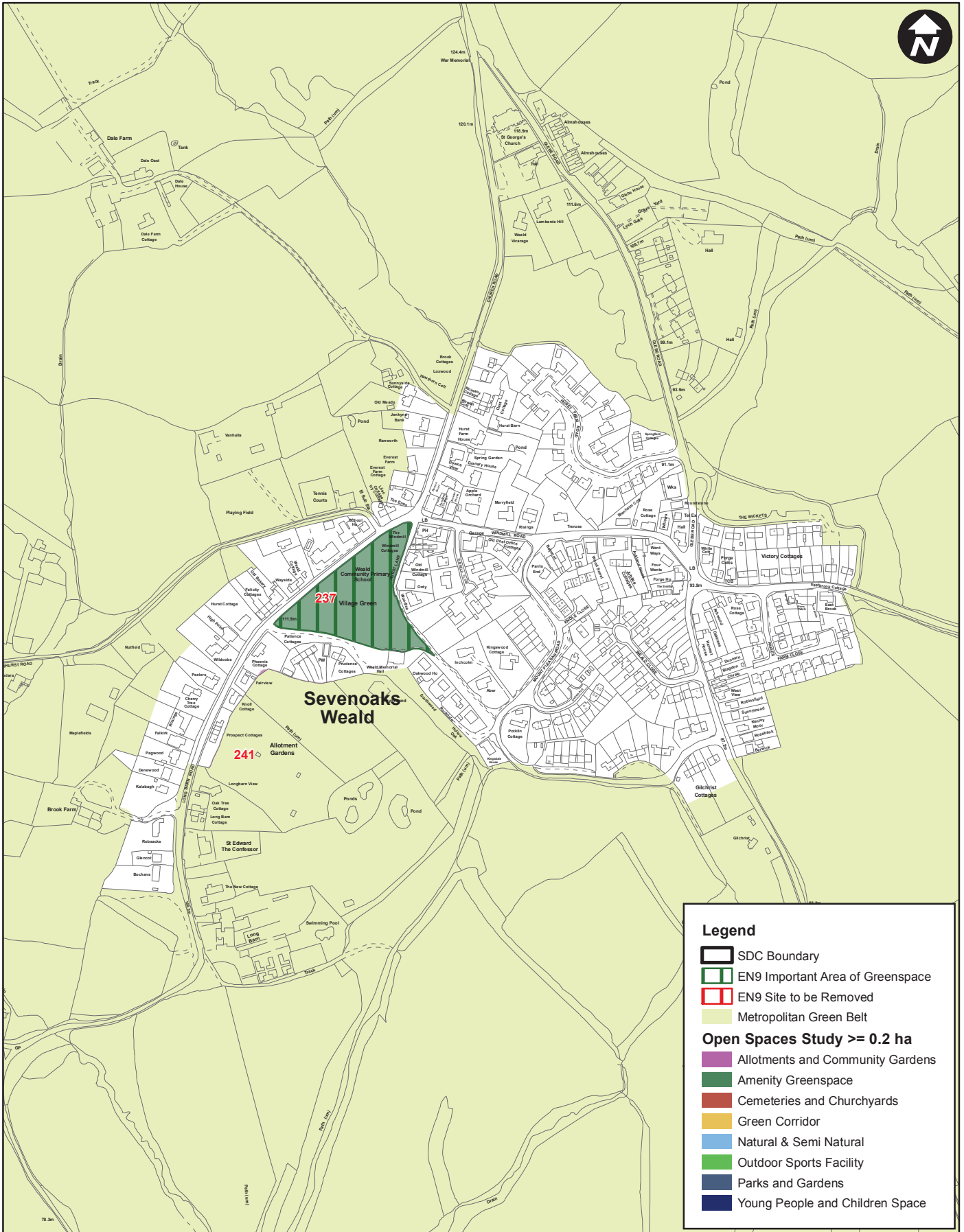
- Allotments and Community Gardens
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Seal		Scale: 1:5,000
Open Spaces Study		Date: August 2011
Page 121 Areas over 2000sqm within Urban Confines		
Produced by the GIS Team, Sevenoaks District Council		

Sevenoaks
DISTRICT COUNCIL

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Agenda Item 7



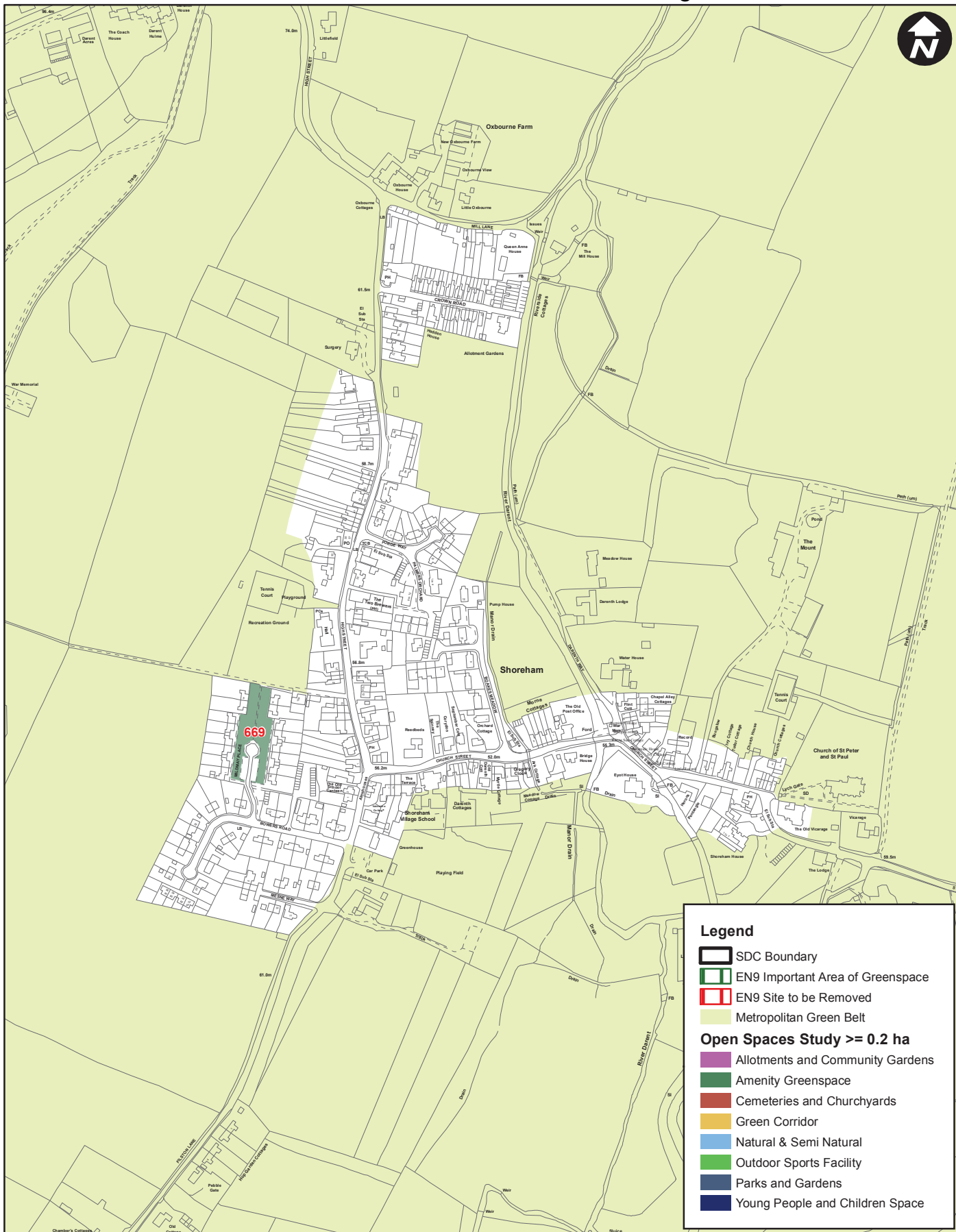
Sevenoaks Weald

Open Spaces Study

Scale: 1:5,000

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Shoreham

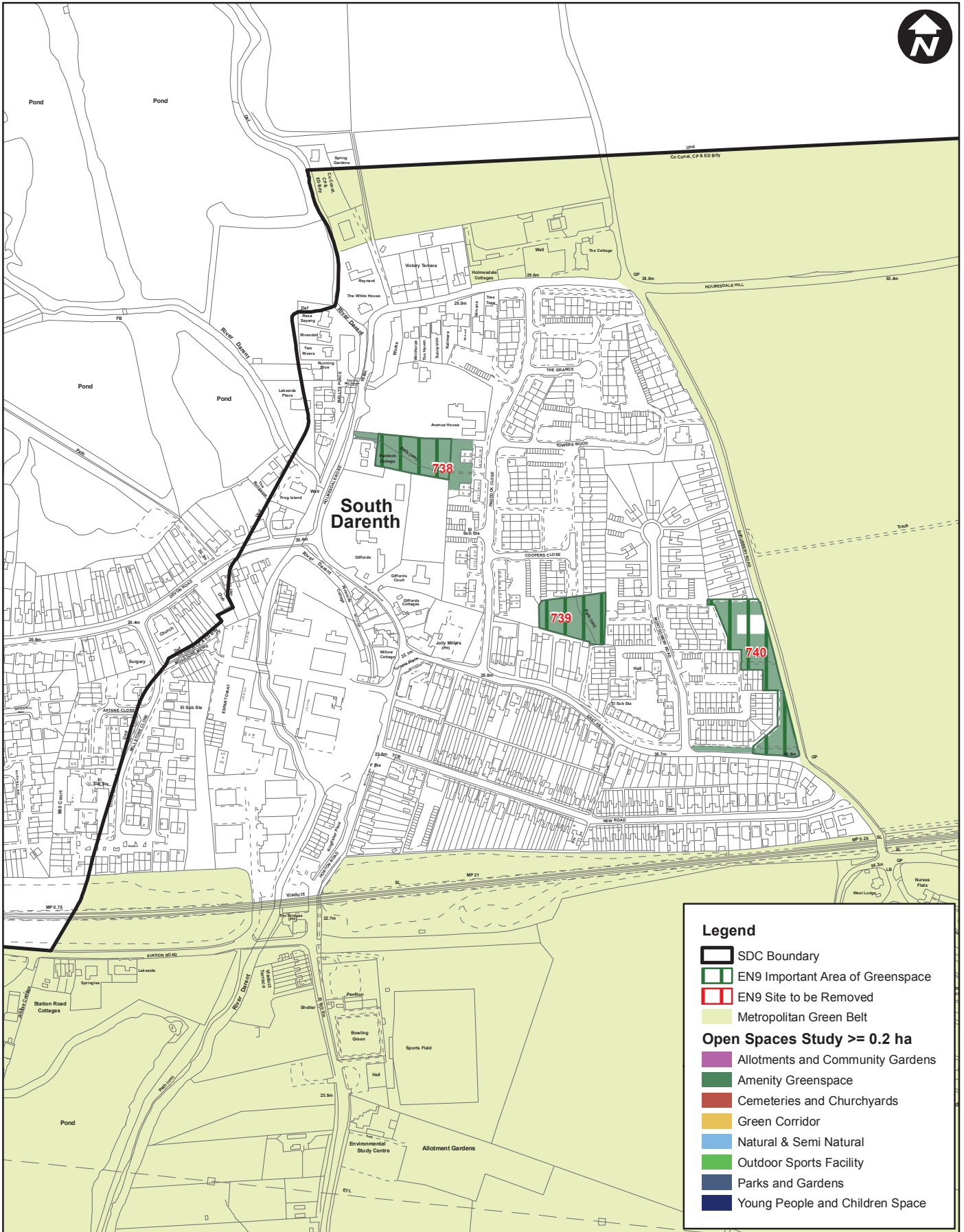
Open Spaces Study

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Date: August 2011

Areas over 2000sqm within Urban Confines

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Agenda Item 7



South Darenth

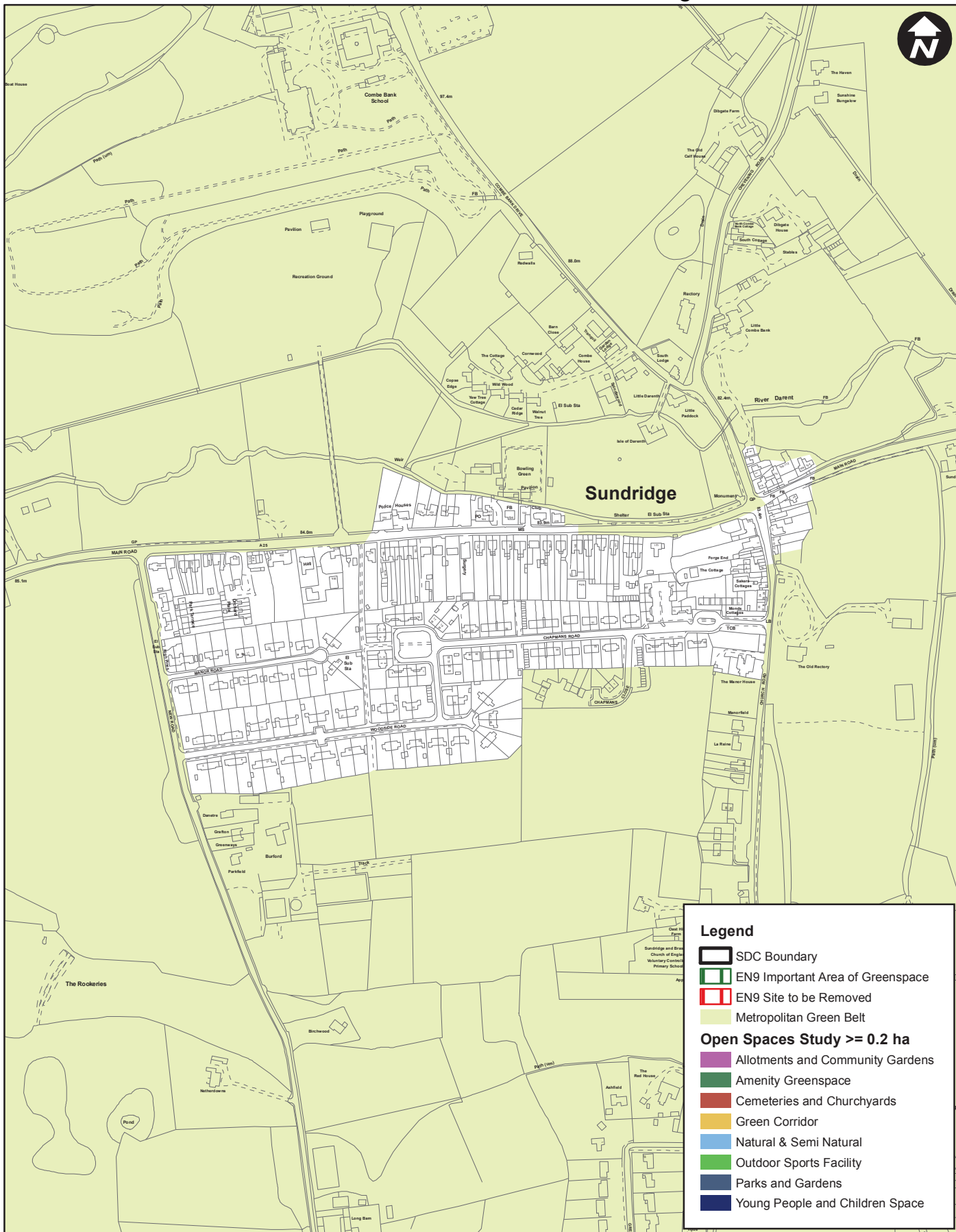
Open Spaces Study

Scale: 1:5,000

Date: August 2011

Areas over 200sqm within Urban Confines

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Legend

- SDC Boundary
- EN9 Important Area of Greenspace
- EN9 Site to be Removed
- Metropolitan Green Belt

Open Spaces Study >= 0.2 ha

- Allotments and Community Gardens
- Amenity Greenspace
- Cemeteries and Churchyards
- Green Corridor
- Natural & Semi Natural
- Outdoor Sports Facility
- Parks and Gardens
- Young People and Children Space



Sundridge
 Open Spaces Study
 Areas over 2000sqm within Urban Confines

Scale: 1:5,000
 Date: August 2011

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LOCAL DEVELOPMENT FRAMEWORK

ALLOCATIONS AND DEVELOPMENT MANAGEMENT DPD

DRAFT OPEN SPACE ALLOCATIONS

DRAFT INTERIM SUSTAINABILITY APPRAISAL REPORT

AUGUST 2011

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ALLOCATIONS AND DEVELOPMENT MANAGEMENT DPD
DRAFT OPEN SPACE ALLOCATIONS

DRAFT INTERIM SUSTAINABILITY APPRAISAL REPORT

AUGUST 2011

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1 INTRODUCTION

Local Development Framework Background

- 1.1 Sevenoaks District Council is currently preparing its Local Development Framework (LDF), which will replace the Sevenoaks District Local Plan. The LDF will comprise of two Development Plan Documents (DPDs), the adopted Core Strategy, and the emerging Allocations and Development Management DPD.
- 1.2 The objective of the Allocations and Development Management DPD will specifically be to identify new land use site allocations for housing and employment, to set out allocations for protected open areas and to set the boundaries for other land use designations such as the Green Belt and AONB. It will also provide a comprehensive set of generic development management policies to replace those currently saved from the Sevenoaks District Local Plan. These will act as the basis for determining planning applications.
- 1.3 Previously it was the intention of the Council that the Allocations and Development Management Policy DPDs would be two separate documents. However the Council have now chosen to combine them into one single DPD, to speed up production and to fill any outstanding policy gaps.
- 1.4 Prior to this decision, an option draft of the initial housing and employment allocations (known as the Allocations (Options) DPD) was subject to a public consultation and sustainability appraisal assessment between January and March 2010. This was followed up with a draft consultation on Development Management policies in May 2011.
- 1.5 The Council are now considering any outstanding site allocation issues that have yet been subject to a formal public consultation, in order to be able to progress the document to the publication stage. This process includes a consultation on areas of open space to be protected through the DPD, to which this Interim Sustainability Appraisal document relates.
- 1.6 There will be an opportunity to make representations on the publication document, which will take place in due course prior to the submission of the DPD to the Secretary of State.

Sustainability Appraisal

- 1.7 Under the Planning and Compulsory Purchase Act 2004, DPDs must undergo a Sustainability Appraisal (SA). Sustainability Appraisal involves the identification and evaluation of the DPDs impacts on the three elements of sustainable development those being the economic, social and environmental impacts. The SA process incorporates the requirements of European Law on

the environmental assessment of plans (referred to as the ‘Strategic Environmental Assessment Directive’).

- 1.8 In 2005 Consultants Scott Wilson (who have since become part of URS) carried out a Sustainability Appraisal Scoping Report (SA Scoping Report) on the LDF that covered the key DPDs proposed at the time, including the issues surrounding the Core Strategy. The report was updated in 2007 as the Core Strategy progressed through the production process.
- 1.9 Through this scoping process a series of key sustainability objectives were produced for the District which highlighted some of the particular sustainability priorities that the LDF should seek to address, and the monitors and targets by which they would be assessed.
- 1.10 Following the adoption of the Core Strategy, the Council produced a SA Scoping Report Update, in conjunction with consultants URS/Scott Wilson, which reviewed the baseline data and policy framework in which future DPDs will be considered. This scoping report was published for consultation in May 2011.

This Document

- 1.11 The purpose of this document is to provide an interim assessment of the sustainability issues with regard to the Draft Open Space Allocations. The document tests the approach taken to identifying open space for protection against the sustainability objectives identified through the scoping stage, with the goal of ensuring that the environmental quality and local distinctiveness of the Sevenoaks District is maintained.
- 1.12 A detailed appraisal of the types of open space to be protected has been undertaken in order to test the allocations for potential sustainability conflicts.
- 1.13 A public consultation will take place between *** on both the draft open space allocations and this SA Report.
- 1.14 Following these consultations a publication version of the Allocations and Development Management DPD will be prepared drawing on representations received on all of the previous consultations.
- 1.15 The publication version of the DPD will be accompanied by a full SA Report, which will be supported by documentation to demonstrate how the proposed allocations and policies were amended to take account of comments raised and mitigation measures identified from the SA.

Should you wish to comment on this SA Report, please do so in writing no later than *** 2011.

Write to:

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Sevenoaks District Council
Council Offices
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Kent
TN13 1HG

E-mail: ldf.consultation@sevenoaks.gov.uk

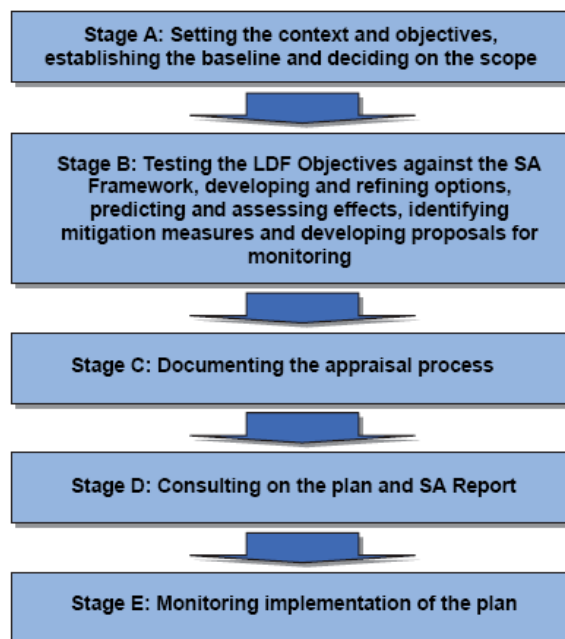
2 SUSTAINABILITY APPRAISAL / SEA DIRECTIVE

- 2.1 By law, DPDs are subject to Strategic Environmental Assessment (SEA) and SA. SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of plans and programmes including LDFs.
- 2.2 SA extends the concept of SEA fully to encompass economic and social concerns. Under the Planning and Compulsory Purchase Act 2004 (PCPA), SA should be undertaken for the constituent DPDs of the LDF. SA is therefore a statutory requirement for LDFs along with SEA. The Government's approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social as well as environmental effects. To this end, the Department for Communities and Local Government (CLG) Plan Making Manual provides detailed guidance as to the approach to be taken to SA and SEA. The combined SEA/SA process is referred to in this document as SA.
- 2.3 The Guidance advocates a five-stage approach to undertaking SA (see below).

Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which each DPD can be assessed – together with the evidence base that will help to inform the appraisal.

The subsequent stages of the SA process involve the main body of appraisal work including developing and refining options and assessing the effects.

Figure 1: The five stage approach to SA



Sevenoaks Sustainability Objectives

2.4 SA provides a continuous process that informs all stages of the plan making process, and aids the identification of potentially adverse impacts of development. In particular SA seeks to ensure that the decision-making process takes into account the Government’s key objectives of sustainable development:

- Social progress which meets the needs of everyone;
- Effective protection of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment

2.5 In 2005 Consultants Scott Wilson carried out a SA Scoping Report on the LDF that covered the key DPDs proposed at the time, including the issues surrounding the Core Strategy. A set of 13 key sustainability objectives were derived as a result of this scoping exercise. Following production of the SA Scoping Report Update the Council considers them to remain relevant.

Sustainability Objectives of the LDF derived from the Scoping Stage	
1	To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2	To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3	To improve the health and well-being of the population and reduce inequalities in health
4	To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5	To improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6	To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7	To conserve and enhance biodiversity and geodiversity
8	To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9	To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10	To create a high quality built environment
11	To promote sustainable forms of development and sustainable use of natural resources
12	To encourage high and stable levels of employment and sustain economic competitiveness
13	To improve the development and retention of skills

2.6 This SA Assessment Report therefore follows the same approach to that which was adopted with the Core Strategy and Draft Policies for consultation. The appraisal assesses the open space types for their compatibility with these 13 sustainability objectives in order to evaluate whether the allocations proposed are suitable, and the most effective approach to addressing these priority areas.

3 METHODOLOGY

- 3.1 Scoping is the first stage of SA that is completed before production of the plan document starts. As detailed in Chapter 1, three SA Scoping Reports have been produced as part of the LDF process, which have helped develop the approach to considering Allocations and Development Management Policies and fulfils a number of important roles that set the basis of SA for the process.
- 3.2 This Interim SA Report of the draft Open Space Allocations assessed the extent to which the draft open space allocations will help to achieve the relevant sustainability objectives of the wider Sevenoaks LDF. The appraisal is based on an assessment of each potential open space allocation type against the thirteen Sustainability Objectives set out in the LDF Scoping Report.
- 3.3 More detailed assessment will be carried out as the DPD progresses through the stages of production.

Traffic Light Assessment

- 3.4 The Interim SA uses the process of appraising open space types against the LDF sustainability objectives and utilised a traffic light assessment method to measure the impacts of policy proposals. The purpose of the traffic light assessment was to establish the positive and negative aspects of sustainability against the objectives of the LDF.
- 3.5 The traffic light system was preferred for assessing proposals rather than risk false precision by giving a numerical sustainability rating. For example if the allocations were assessed on a numerical basis rather than the traffic light system, the comparison between a score of 10 and 5 would imply that the former is twice as good as the latter, which is unlikely to be the case.
- 3.6 A guide to the traffic light approach is included below.

Guide to Traffic Light Policy Assessment

++	<i>The open space type has a very positive impact on the sustainability objective</i>
+	<i>The open space type has a positive impact on the sustainability objective</i>
0	<i>The open space type has a neutral impact on the sustainability objective</i>
-	<i>The open space type has a negative impact on the sustainability objective</i>
--	<i>The open space type has a very negative impact on the sustainability objective</i>

Assessment

- 3.7 Open Space types are considered against the sustainability objectives, and are included within the consultation document for either having been identified in the Council's evidence base through the Open Space Study (Jan 2009) or because they were previously protected under Policy EN9 of the Sevenoaks District Local Plan. Both of these documents are available on the Council's website www.sevenoaks.gov.uk.
- 3.8 All open space types have been given an initial rating using the traffic light methodology as detailed above. Where open space types are judged to receive a negative impact, this will inform future development of the allocations policy and determine whether there is a direct conflict between two separate sustainability objectives or whether the policy is negative to an extent that would warrant significant amendment or removal before the document continues through the process.

4 ALLOCATION ASSESSMENT OVERVIEW

4.1 Taking into consideration the methodology described, the following matrix sets out the findings of the initial assessment and the impact of the draft open space types against their contribution and impact upon the key sustainability objectives of the LDF. Detailed appraisals of the open space types are included at Appendix 1.

Open Space Type	Sustainability Objective												
	1 Housing	2 Flooding	3 Health	4 Inclusion	5 Accessibility	6 Air quality	7 Biodiversity	8 Environment	9 Travel	10 Built Environment	11 Sustainability	12 Economy	13 Skills
Allotment & Community Gardens	++	+	++	+	++	+	+	+	+	+	++	+	+
Amenity Green Space	+	+	+	+	++	+	+	+	+	++	+	+	+
Cemeteries and Churchyards	+	+	+	+	+	+	++	+	+	+	+	+	+
Green Corridor	+	+	++	+	+	+	+	+	+	+	+	+	+
Natural & Semi Natural	+	+	+	+	+	++	++	+	+	+	+	+	+
Outdoor Sports Facilities	+	+	++	+	++	+	+	+	+	+	+	+	+
Parks and Gardens	+	+	++	+	+	+	+	+	+	+	+	+	+
Young People and Children Space	+	+	++	+	++	+	+	+	+	+	+	+	+

Sustainability Objective Key	
1	To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2	To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3	To improve the health and well-being of the population and reduce inequalities in health
4	To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5	To improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6	To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7	To conserve and enhance biodiversity and geodiversity
8	To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9	To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10	To create a high quality built environment
11	To promote sustainable forms of development and sustainable use of natural resources
12	To encourage high and stable levels of employment and sustain economic competitiveness
13	To improve the development and retention of skills

++	The open space type has a very positive impact on the sustainability objective
+	The open space type has a positive impact on the sustainability objective
o	The open space type has a neutral impact on the sustainability objective
-	The open space type has a negative impact on the sustainability objective
--	The open space type has a very negative impact on the sustainability objective

5 ASSESSMENT SUMMARY

5.1 Appendix 1 sets out the detailed appraisals of the open space types to be protected, and judges them against the 13 defined sustainability objectives of the LDF. A summary of these findings is included within this section.

Allotments and Community Gardens

5.2 This open space type scores very positively against the sustainability objectives that promote health and well being and promote access to recreational services and facilities. These are considered to be of great significance and identify the important community role that allotment garden play within settlements.

5.3 There are also positive impacts in terms of combating flood risk, increasing social inclusion, mitigating air pollution and protecting biodiversity due to the open nature of the use.

5.4 The remaining sustainability objectives are not considered to be impacted by the protection of allotment gardens and are considered to have a neutral effect.

5.5 There are no negative impacts upon any of the sustainability objectives.

Amenity Green Space

5.6 Amenity Green Space scores very well against the sustainability objectives that seek to improve access to opportunities for sports and recreation. Amenity space is also seen as essential to the creation of new high quality places, and as such features as a key component in the 'Building for Life' assessment process. This open space type therefore received a very positive rating for both of these sustainability objectives.

5.7 There are also positive impacts in terms of combating flood risk, improving health, mitigating air pollution and protecting biodiversity due to the open nature of the use.

5.8 The remaining sustainability objectives are not considered to be affected by the protection of Amenity Green Space and are considered to have a neutral impact.

5.9 There are no negative impacts upon any of the sustainability objectives.

Cemeteries and Churchyards

- 5.10 Cemeteries and Churchyards score very well against the sustainability objective that seek to conserve biodiversity and geodiversity, due to their generally untouched nature, which allow habitats to occupy sites without disturbance.
- 5.11 There are also positive impacts in terms of combating flood risk, mitigating air pollution and protecting the historic environment that surrounds them, which often consists of key features such listed churches and high quality trees.
- 5.12 The remaining sustainability objectives are not considered to be affected by the protection of cemeteries and churchyards and are considered to have a neutral impact.
- 5.13 There are no negative impacts upon any of the sustainability objectives.

Green Corridors

- 5.14 Green Corridors score a very positive rating based upon their role of improving health and well being as they are characterised by recreational attributes such as cycle ways or public footpaths between points of interest. These in turn provide for important opportunities for people to be active and keep fit.
- 5.15 Green corridors also score positively in regards to combating flood risk, creating additional recreational opportunities, reducing air pollution, conserving biodiversity, providing access to the countryside and providing alternative methods of travel through the use of cycle routes and public footpaths.
- 5.16 The remaining sustainability objectives are not considered to be affected by the protection of Green Corridors and are considered to have a neutral impact.
- 5.17 There are no negative impacts upon any of the sustainability objectives.

Natural and Semi Natural Green Spaces

- 5.18 Natural and Semi Natural Green Spaces provide very important contributions when considering against the objectives of improving air quality and conserving biodiversity. The concentration of trees within these areas mean that they have a high quality role in combating air pollution. These areas are also the best quality land types for encouraging rich biodiversity and play an important role in providing important natural habitats.

- 5.19 Natural and Semi Natural Green Spaces also score well against the objectives of managing flood risk, promoting healthy lifestyles, providing access opportunities to countryside and the protection of the historic environment, especially with regards to Heritage and Ancient Woodland.
- 5.20 The remaining sustainability objectives are not considered to be affected by the protection of Natural and Semi Natural Green Spaces and are considered to have a neutral impact.
- 5.21 There are no negative impacts upon any of the sustainability objectives.

Outdoor Sports Facilities

- 5.22 Outdoor sports facilities play an essential role in promoting opportunities for sport and recreation to the benefit of good health. As such the open space type scores very well in relation to these sustainability objectives. It is also acknowledged that sport and recreation can help with social inclusion and integration.
- 5.23 Outdoor Sports facilities usually include open playing fields, however it is acknowledged that the use of land for sports such as tennis or basketball includes can include the provision of some form of hardstanding. Notwithstanding this, since these hard court facilities are usually located within wider green recreation grounds it is considered that overall this type of land has a positive impact upon the objective of managing flood risk.
- 5.24 The remaining sustainability objectives are not considered to be affected by the protection of outdoor sports facilities and are considered to have a neutral impact.
- 5.25 There are no negative impacts upon any of the sustainability objectives.

Parks and Gardens

- 5.26 Parks and Gardens are considered to have a very positive role in promoting health and recreation and positive impacts upon managing flood risk, tackling poverty and social exclusion, reducing air pollution and creating high quality environments.
- 5.27 It is also acknowledged that parks and gardens can be Heritage Assets in their own rights.
- 5.28 The remaining sustainability objectives are not considered to be affected by the protection of parks and gardens and are considered to have a neutral impact.
- 5.29 There are no negative impacts upon any of the sustainability objectives.

Young People and Children Space

- 5.30 This type of space provides essential facilities for health and well being and in creating recreation opportunities for children and young people.
- 5.31 Whilst Young People and Children’s Space scores does not score as favourably as some of the other types of open space it is considered to be one of the most important and much needed types within the District. The open space types does not score any negative scores.

Summary

- 5.32 The most significant very positive ratings are against objective 5 in respect to the improving accessibility to services, facilities and recreational opportunities and to objective 3 to improve the health and well being of the population. In these respects open space is a vital part of the LDF’s delivery of these objectives.
- 5.33 The role of open space in reducing and managing flood risk is generally positive due to the nature of the land to be protected and the natural drainage of undeveloped land.
- 5.34 It can be seen from the matrix in chapter 4 that sustainability objectives 1, 12 and 13 all receive neutral assessments. These objectives relate to the provision of housing, employment and the retention of skills, all of which are of little relevance to the provision and protection of open space.

6 APPRAISAL CONCLUSIONS & KEY RECOMMENDATIONS

- 6.1 The principal findings of the Draft SA for the Open Space Allocations suggest that the overall impact of protecting this land is positive, particularly in terms of providing opportunities for recreation and for promoting the health and well being in the District.
- 6.2 There are also other positive aspects of keeping land open in terms of environmental protection and the protection of biodiversity and natural habitats.
- 6.3 There are neutral impacts on the key economic objectives such as the delivery of sustainable homes, employment provision and the retention of skills, which would be expected when proposing the protection of open space, which has a social rather than economic gain.
- 6.4 There are no identified negative impacts of protecting any of the different open space types.

Recommendations

- 6.5 The open space types defined within the Draft Open Space Allocations were derived from the Council's Open Space Study (2009) and the Sevenoaks District Local Plan (2000) and relate to the different types of open space that currently exists within the District. Unlike replacement policies the draft consultation document seeks to provide formal protection for these pieces of land in their current state. As such there is little scope to identify areas of improvement or missed opportunity.
- 6.6 However the SA process has identified the positive role that the different open spaces provide in recreational and exercise opportunities for residents and that any formal policy could include provision to allow development that meets or helps enhance these key purposes.
- 6.7 The SA process has also identified that there are significant differences in the types and nature or the different open space types and that Allocations policy framework should set out what the key features, benefits and aspects for preservation are.
- 6.8 The appraisal process can also help better determine the most appropriate types of new space to be provided within new development.

APPENDIX 1
OPEN SPACE TYPE APPRAISALS

ALLOTMENTS AND COMMUNITY GARDENS	
<p>This includes all forms of allotments, with a primary purpose to provide opportunities for people to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion. This type of open space may also include urban farms.</p>	
<p>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>	
<p>The open space type would have a neutral impact upon this sustainability objective.</p>	
<p>Traffic Light Assessment</p>	<p>o</p>
<p>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</p>	
<p>Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding.</p>	
<p>Traffic Light Assessment</p>	<p>+</p>
<p>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</p>	
<p>Allotments are recognised as an important land use that provides opportunities for improving physical and mental health.</p>	
<p>Traffic Light Assessment</p>	<p>++</p>
<p>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</p>	
<p>Allotments have a primary purpose to provide opportunities for people to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion.</p>	
<p>Traffic Light Assessment</p>	<p>+</p>
<p>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</p>	
<p>Allotments can provide a number of wider benefits to the community as well as the primary use of growing produce. The provision of allotments provides invaluable opportunities for people to enjoy them for social and recreational purposes.</p>	
<p>Traffic Light Assessment</p>	<p>++</p>
<p>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</p>	
<p>All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees.</p>	
<p>Traffic Light Assessment</p>	<p>+</p>
<p>Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity</p>	
<p>Allotments provide natural habitats and contain rich sources of biodiversity.</p>	

Traffic Light Assessment	+
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 10 - To create a high quality built environment	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
A primary purpose of allotments and community gardens are to provide opportunities for people to grow their own produce as part of the long-term promotion of sustainability. It also promotes a prudent use of natural resources.	
Traffic Light Assessment	++
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o

AMENITY GREEN SPACE	
<p>This type of open space is most commonly found in housing areas. It includes informal recreation spaces and green spaces in and around housing. The primary purpose is to provide opportunities for informal activities close to home or work or to enhance the appearance of residential or other areas.</p> <p>Much of the focus on the protection of green space in Sevenoaks District has concentrated on large open space areas such as playing fields and the Metropolitan Green Belt.</p> <p>However, amenity green space can often be valuable in the ‘greening’ of an area but can suffer from development pressures. This is particularly true in urban areas.</p> <p>The pressure for increased housing in Sevenoaks District makes amenity green spaces particularly vulnerable to development so the protection of sites is particularly important for this typology.</p>	
Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	
Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding.	
Traffic Light Assessment	+
Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health	
Amenity Green Space is recognised as an important land use that provides opportunities for improving physical health.	
Traffic Light Assessment	+
Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	
Amenity Green Space is recognised as an important land use that provides opportunities for improving physical health and providing recreational opportunities within urban areas.	
Traffic Light Assessment	++
Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	

All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees.	
Traffic Light Assessment	+
Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity	
Amenity Green Space provide natural habitats that offer opportunities for biodiversity, however the recreational use of such facilities does limit the potential of amenity green space.	
Traffic Light Assessment	+
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
Amenity Green Space is usually located within the existing built confines of settlements.	
Traffic Light Assessment	o
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 10 - To create a high quality built environment	
Amenity Green Space is an important aspect of good design and is a key feature in creating a high quality built environment. Open space is recognised as a key component of high quality design when assessing against 'Building for Life'.	
Traffic Light Assessment	++
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
The open space type would have a neutral impact upon this sustainability objective	
Traffic Light Assessment	o
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o

CEMETERIES AND CHURCHYARDS	
<p>Churchyards are encompassed within the walled boundary of a church and cemeteries are burial grounds outside the confines of a church. These include private burial grounds, local authority burial grounds and disused churchyards. The primary purpose of this type of open space is for burial of the dead and quiet contemplation.</p> <p>A secondary purpose is the promotion of wildlife conservation and biodiversity.</p>	
<p><i>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i></p>	
<p>The open space type would have a neutral impact upon this sustainability objective.</p>	
Traffic Light Assessment	o
<p><i>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</i></p>	
<p>Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding. Whilst cemeteries have a degree of hardstanding this would not reduce the benefit in relation to flooding.</p>	
Traffic Light Assessment	+
<p><i>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</i></p>	
<p>The open space type would have a neutral impact upon this sustainability objective.</p>	
Traffic Light Assessment	o
<p><i>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</i></p>	
<p>The open space type would have a neutral impact upon this sustainability objective.</p>	
Traffic Light Assessment	o
<p><i>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</i></p>	
<p>The open space type would have a neutral impact upon this sustainability objective.</p>	
Traffic Light Assessment	o
<p><i>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</i></p>	
<p>All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees.</p>	
Traffic Light Assessment	+
<p><i>Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity</i></p>	
<p>Cemeteries and churchyards provide natural habitats that offer high quality opportunities for</p>	

biodiversity and geodiversity.	
Traffic Light Assessment	++
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
Cemeteries and churchyards provide important features of significant high quality historic assets within the District including grade 1 listed churches and play an important role in preserving their setting.	
Traffic Light Assessment	+
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 10 - To create a high quality built environment	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o

GREEN CORRIDORS	
Green corridors includes towpaths along canals and riverbanks, cycleways, rights of way and disused railway lines. Their primary purpose is to provide opportunities for walking, cycling and horse riding (for leisure purposes and travel) and opportunities for wildlife migration. Walking and horse riding are important recreational activities in the District and information on routes can be found on Kent County Council's Public Rights of Way map.	
<i>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
<i>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</i>	
Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding.	
Traffic Light Assessment	+
<i>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</i>	
Green Corridors are recognised as an important land use that provides opportunities for improving physical health through activities such as walking and cycling.	
Traffic Light Assessment	++
<i>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
<i>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</i>	
Green Corridors are recognised as an important land use that provides opportunities for recreational activities such as walking and cycling.	
Traffic Light Assessment	+
<i>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</i>	
All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees. The use of Green Corridors also provides important alternative travel methods such as footpath links and cycle paths.	
Traffic Light Assessment	+
<i>Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity</i>	
Green Corridors provide opportunities for biodiversity and geodiversity, however these are also limited and restricted by the recreational use of the land.	

Traffic Light Assessment	+
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
Green corridors provide important linkages between spaces, often surrounding Heritage Assets, and thereby promoting better quality access to these facilities. Green Corridors also provide important links in and out of areas of open countryside.	
Traffic Light Assessment	+
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
Green Corridors provide important linkages for alternative methods of transport including footpaths and cycle ways that provide alternatives to car use.	
Traffic Light Assessment	+
Strategic Objective 10 - To create a high quality built environment	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
Green Corridors are recognised as providing opportunities for activities such as walking and cycling, which are alternative forms of transportation as well as recreational activities.	
Traffic Light Assessment	+
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o

NATURAL AND SEMI-NATURAL	
This type of open space includes woodlands, urban forestry, scrubland, grasslands (eg downlands, commons, meadows), wetlands, nature reserves and wastelands with a primary purpose of wildlife conservation and bio-diversity within the settlement boundaries.	
<i>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
<i>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</i>	
Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding.	
Traffic Light Assessment	+
<i>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</i>	
Natural and semi-natural areas are recognised as providing opportunities for improving physical health through activities such as walking.	
Traffic Light Assessment	+
<i>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</i>	
.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
<i>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</i>	
Natural and semi-natural areas are recognised as an important land use that provides opportunities for recreational activities such as walking and cycling.	
Traffic Light Assessment	+
<i>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</i>	
All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees. However the concentration of trees in areas of natural and semi natural green space provides a greater natural positive in combating air quality problems.	
Traffic Light Assessment	++
<i>Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity</i>	
Natural and semi-natural areas provide high quality opportunities for biodiversity and geodiversity.	

Traffic Light Assessment	++
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
Natural and Semi Natural Green Space covers areas of Heritage Woodland and Ancient woodland, which in itself is an important Heritage Asset that should be preserved and enhanced and that should be protected for general public access.	
Traffic Light Assessment	+
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 10 - To create a high quality built environment	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o

OUTDOOR SPORTS FACILITIES	
<p>The assessment of sports facilities covers both outdoor (as per the PPG17 typology) and indoor sports facilities.</p> <p><i>Outdoor sports facilities</i> is a wide-ranging category of open space and includes natural and artificial surfaces either publicly or privately owned, which are used for sport and recreation. Examples include playing pitches, athletics tracks, bowling greens and tennis courts. The primary purpose is participation in outdoor sports.</p>	
<p>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>	
<p>The open space type would have a neutral impact upon this sustainability objective.</p>	
Traffic Light Assessment	o
<p>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</p>	
<p>Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding. In most instances outdoor sports facilities usually amount to playing fields, however it is acknowledged that the use of land for sports such as tennis or basketball includes the provision of some form of hardstanding. However since these facilities are usually located within wider green recreation grounds it is considered that overall this type of land has a positive impact upon this sustainability objective.</p>	
Traffic Light Assessment	+
<p>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</p>	
<p>Outdoor sports facilities are recognised as providing vital opportunities for improving physical health through sports activities.</p>	
Traffic Light Assessment	++
<p>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</p>	
<p>Outdoor sports facilities are recognised as providing vital opportunities for sports activities, which provide significant opportunities to combat social exclusion and integration.</p>	
Traffic Light Assessment	+
<p>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</p>	
<p>Outdoor sports facilities are recognised as an important land use that provides opportunities for sports and activities.</p>	
Traffic Light Assessment	++
<p>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</p>	
<p>All open space provides positive impacts on air quality either through the openness of the land, the role</p>	

of a buffer or through direct features such as trees.	
Traffic Light Assessment	+
Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 10 - To create a high quality built environment	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o

PARKS AND GARDENS	
This type of open space includes urban parks, formal gardens and country parks.	
These provide opportunities for informal recreation and community events. This typology also has many wider benefits including a sense of place for the local community, ecological and education benefits, help with social inclusion and provide structural and landscaping benefits.	
<i>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
<i>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</i>	
Any green open space, by its very nature, is porous and helps combat and minimise the potential harm of flooding.	
Traffic Light Assessment	+
<i>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</i>	
Parks and Gardens have many benefits including opportunities for walking and other exercise beneficial to good quality health and well being.	
Traffic Light Assessment	++
<i>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</i>	
Parks and Garden are recognised as providing opportunities for social inclusion and integration through public events and open access. The use of land for facilities such as fetes and fairs is such an example.	
Traffic Light Assessment	+
<i>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</i>	
Parks and Gardens have many positive impacts including providing a sense of place for the local community and offering recreational, ecological and education benefits.	
Traffic Light Assessment	+
<i>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</i>	
All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees.	
Traffic Light Assessment	+
<i>Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity</i>	
The open space type would have a neutral impact upon this sustainability objective.	

Traffic Light Assessment	0
Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic Environment.	
Historic Parks and Garden in themselves are recognised Heritage Assets.	
Traffic Light Assessment	+
Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
Strategic Objective 10 - To create a high quality built environment	
Parks and Gardens are a key feature in urban landscapes and are recognised as heritage assets.	
Traffic Light Assessment	+
Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
Strategic Objective 13 - To improve the development and retention of skills	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0

PROVISION FOR CHILDREN AND YOUNG PEOPLE	
This type of open space includes areas such as equipped play areas, ball courts, skateboard areas and teenage shelters. They have the primary purpose of providing opportunities for play and social interaction involving both children and young people.	
<i>Strategic Objective 1 - To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
<i>Strategic Objective 2 - To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</i>	
The open space type would have a neutral impact upon flooding as the majority of these facilities involve the laying of hardstanding.	
Traffic Light Assessment	o
<i>Strategic Objective 3 - To improve the health and well-being of the population and reduce inequalities in health</i>	
Provision of space for children and young people provides important access for sports and recreation, to the benefit of their wider health	
Traffic Light Assessment	++
<i>Strategic Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</i>	
Provision of space for children and young people provides opportunities for social inclusion and integration.	
Traffic Light Assessment	+
<i>Strategic Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</i>	
Provision of space for children and young people provides opportunities for social inclusion and facilities for recreational opportunities.	
Traffic Light Assessment	++
<i>Strategic Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve</i>	
All open space provides positive impacts on air quality either through the openness of the land, the role of a buffer or through direct features such as trees.	
Traffic Light Assessment	+
<i>Strategic Objective 7 - To conserve and enhance biodiversity and geodiversity</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	o
<i>Strategic Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and</i>	

<i>the historic Environment.</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
<i>Strategic Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
<i>Strategic Objective 10 - To create a high quality built environment</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
<i>Strategic Objective 11 - To promote sustainable forms of development and sustainable use of natural resources</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
<i>Strategic Objective 12 - To encourage high and stable levels of employment and sustain economic competitiveness</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0
<i>Strategic Objective 13 - To improve the development and retention of skills</i>	
The open space type would have a neutral impact upon this sustainability objective.	
Traffic Light Assessment	0

LDF ADVISORY GROUP 7 SEPTEMBER 2011

LDF AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

Report of the: Director of Community and Planning Services

Also considered by: Cabinet

Status: For Consideration

Key Decision: No

Executive Summary: The Affordable Housing Supplementary Planning Document (SPD) is part of the Local Development Framework (LDF). Its purpose is to provide further details on how the Council will apply Core Strategy Policy SP3 (Affordable Housing).

Consultation on a draft of the SPD took place over a 10 week period from late May to early August and some changes are proposed in response to comments received (see Appendix A). Subject to these changes the SPD is recommended for adoption.

Once adopted it will be a material consideration in the determination of planning applications and will help to support the implementation of Core Strategy policy on affordable housing.

This report supports the key aims of a green environment and safe and caring communities of the Community Plan

Portfolio Holder Cllr Mrs Davison

Head of Service Head of Development Services – Mr Jim Kehoe

Recommendation: It be RESOLVED that it be recommended to Cabinet that:

- (a) the Affordable Housing SPD be amended as proposed in Appendix A;
- (b) the Affordable Housing SPD as amended be adopted as a supplementary planning document; and
- (c) copies be made available for sale at a price to be agreed by the Portfolio Holder.

Reason for recommendation:

To progress the Council's Local Development Framework.

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Background

- 1 Supplementary Planning Documents (SPDs) can be used to provide greater detail on policies in Development Plan Documents (DPDs) but cannot be used to introduce new policies that should be in DPDs. They must be consistent with existing national, regional and local planning policy.
- 2 The Core Strategy states that a supplementary planning document will be prepared to give guidance on the implementation of Core Strategy Policy SP3 (affordable housing), including arrangements for financial contributions.
- 3 A working draft of the SPD was considered by the LDF Advisory Group on 23 August 2010 and made available to the Core Strategy Examination in October. Following adoption of the Core Strategy the draft for consultation was considered at the April 2011 meetings of the LDF Advisory Group and the Environment Select Committee and agreed by Cabinet for consultation on 14 April.
- 4 Once adopted, the SPDs will be a material consideration in the determination of planning applications.

The Affordable Housing SPD

- 5 The Affordable Housing SPD provides guidance on how the Council will implement Core Strategy policy SP3 which introduces lower thresholds for seeking on site contributions to affordable housing including financial contributions from residential schemes of less than 5 units.
- 6 The SPD clarifies what types of housing should contribute and gives guidance on the calculation of the number of units required for different size schemes together with guidance on how provision should be made within developments.
- 7 Where a financial contribution to off site provision is required (generally schemes of less than five units) it includes specific guidance on the calculation of financial contributions. It sets out the ways in which financial contributions may be used to increase affordable housing provision, including funding measures to make better use of the existing stock as well as contributing to new development.
- 8 It includes information on the procedures to be applied in considering applications in relation to affordable housing and mechanisms for ensuring the delivery of affordable housing on approved schemes. It sets out how issues of development viability will be considered in accordance with Core Strategy policy. Finally it includes measures for monitoring the delivery of affordable housing and the use of funds collected under the policy.

Consultation

- 9 The draft SPD was subject to consultation for a ten week period from May 26 to August 4 in conjunction with the consultation on the Allocations and Development Management Policies DPD.

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- 10 The attached consultation statement (Appendix B) describes the consultation activities that were carried out. Consultation included direct mailings to consultees and others on our mailing list, publicity on the website and in the press, a special meeting of the Planning Agents Forum, a meeting with Registered Providers of Social Housing, a briefing for Town and Parish Councils and drop in sessions for members of the public.

Amendments Following Consultation

- 11 The document has been reviewed following the consultation and some changes are proposed. The main areas of change are:
- Updating to take account of changes to Government policy on social housing and funding arrangements
 - Clarification of the consideration of viability issues, including ensuring that the policy does not operate in a way that makes development non-viable
 - Clearer guidance on how financial contributions will be used
 - Clarification of arrangements for monitoring including publication of monitoring information
- 12 Some respondents questioned the basis of the policy and sought changes that would be tantamount to a change in policy. The starting point for most of these is that the policy would make development non-viable. These representations have been noted but policy is set through the Core Strategy and it is not the role of the SPD to change the overall policy approach. It should be remembered that the Core Strategy was only adopted in February of this year and that the Examination took place last October when economic conditions were very similar to now. Both the policy and the SPD include provisions that viability issues should be taken into account.
- 13 Some respondents sought the replacement of the formula for calculating financial contributions with the use of an individual financial appraisal for each development. This would require separate appraisals of viability for every application which is not considered justified. The viability chapter enables the use of financial appraisals in cases where developers consider that provision under the policy would not be viable.

Options (and Reasons for the Recommendation)

- 14 The options are to agree, vary or reject the Affordable Housing and Developer Contributions SPD. The document will form part of the LDF and must be compliant with the Core Strategy.
- 15 The SPD as revised is considered to provide useful further information on how Core Strategy policy SP3 will be applied and will aid the Council in determining planning applications and presenting arguments at appeals. There have been two appeal decisions where Inspectors have not applied Core Strategy policy

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because the SPD was not in place and, although there have been subsequent appeal decisions where developments have been refused under Core Strategy policy, adoption of the SPD will assist in ensuring delivery of policy on affordable housing and support if needed on appeal.

Key Implications

Financial

- 25 Budgetary provision has been made for the cost involved in preparing the Affordable Housing SPD through the LDF budget.

Community Impact and Outcomes

- 26 The SPD will assist in increasing the supply of affordable housing in the District and funding from financial contributions may also assist in making better use of the existing housing stock.

Legal, Human Rights etc.

- 27 The SPD has been prepared in accordance with the relevant regulations.

Equality Impacts

- 28 An updated Equality Impact Assessment of the Core Strategy was carried out prior to adoption. The SPD is consistent with the Core Strategy and introduces no new policies.

Sustainability Checklist

- 29 The sustainability impacts of the affordable housing policy were considered through the Sustainability Appraisal of the Core Strategy. As such, there is no legal requirement to carry out a Sustainability Appraisal.

Conclusions

- 30 The SPD provides useful further information on how Core Strategy policy SP3 will be applied and will aid the Council in determining planning applications and presenting the Council's case at appeals. It is recommended that the SPD as proposed to be revised is adopted.

Risk Assessment Statement

- 31 The document has been prepared in accordance with the national, regional and local policies.
- 32 If the document is not adopted this may lead to difficulties in securing affordable housing provision or contributions towards infrastructure from planning applications.

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Background Papers: Affordable Housing Supplementary Planning Document.

The Core Strategy DPD.

Contact Officer(s): Alan Dyer Ext 7440

Kristen Paterson
Community and Planning Services Director

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AFFORDABLE HOUSING SPD: SCHEDULE OF AMENDMENTS

(Note: Deleted text is ~~crossed-out~~ and new text is in *italics*)

Para	Amendment	Reason
Various	Delete all consultation questions	To reflect the adoption of the SPD
1.5	Amend first sentence to read: "This SPD will form <i>forms</i> a material consideration in the determination of planning applications and will be <i>is</i> considered alongside Policy SP3.."	To reflect the adoption of the SPD
1.6-1.7	Delete this section which deals with consultation arrangements and replace with new para 1.6: <i>"The SPD was adopted by the Council on 15 September 2011"</i>	To reflect the intended adoption of the SPD at Cabinet on 15 September.
2.1	Delete second sentence and replace with: <i>"PPS3 includes a definition of affordable housing which was updated in June 2011 (see para 3.1). This is the definition used by the Council."</i>	To take account of the updating of PPS3
2.2	Add footnote at the end of the first sentence: <i>"At the time of adoption of the SPD the Government was consulting on the draft National Planning Policy Framework which includes a proposal to remove the national minimum site size threshold."</i>	To take account of a potential change to national policy that is currently subject to consultation
2.6	Amend third sentence to read: "The need for specialist housing is regularly reviewed and updated <i>assessed in conjunction with KCC Social Services and Supporting People.</i> "	To set out the position more clearly
3.1	Add new sentence at end: <i>"This definition includes the new "affordable rent" product which was added in June 2011, after the adoption of the Core Strategy. In applying Core Strategy policy references to social rented should be taken as including affordable rent."</i>	To clarify how Core Strategy policy should be applied in the light of the amendment to the affordable housing definition.
Table 5.1	Amend heading of third column to read: "Number of Social Rented/ <i>Affordable Rent</i> Units	To include affordable rented units
5.9	Add new text after first sentence: <i>"The price to be paid by the Registered Provider or other private sector body to the developer will therefore need to be at a level that delivers the housing as affordable housing without input of social housing grant. Through the S106 Obligation, the Council can require details of all negotiations"</i>	To clarify the Council's approach

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Para	Amendment	Reason
	<i>between the developer and RP on this matter.</i>	
5.10	Amend start of second sentence to read: “Developers will be required to enter into obligations securing the future appropriate <i>ownership and</i> management of schemes”	To clarify the Council's approach
6.2	Delete and replace with: <i>The way in which financial contributions will be used is set out in para 6.11</i>	To avoid repetition
6.3	Amend to read: Planning permission will be refused for development that makes no contribution or inadequate contribution to affordable housing, where provision could reasonably be made under the terms of the policy <i>without making the development non viable. The policy is not intended to operate in a way that renders development non-viable and thereby reduces development coming forward. Section 8 explains how viability issues will be considered so that where it is demonstrated that development would not be viable with contributions required under the policy, the level of contribution can be reduced or waived to ensure that development remains viable.</i>	To clarify the intention of policy
6.5	Amend to read <i>The Council's approach to assessing the off site financial contribution is to base the calculation on the cost of providing affordable housing on another site of equivalent value. This is taken as the cost of making serviced land available within an equivalent development to construct affordable housing. The financial contribution required from the development is then the relevant proportion sought under the policy, which will generally be 10% of the cost of making the serviced land available. This approach is the one that was found to be viable through the Affordable Housing Viability Assessment.</i>	To clarify the Council's approach
6.7	Amend second sentence to read: “It is recommended <i>expected</i> ...that advice is taken from a suitably qualified independent valuer.”	To clarify the advice to applicants
6.10	Amend to read: <i>“Step 4: Apply the percentage requirement under the affordable housing policy to give the final contribution.</i> In order to calculate the appropriate financial contribution, the affordable housing policy percentage for the number of dwellings to be developed (<i>normally 10%</i>) is applied to the estimated cost of providing the equivalent serviced land to the proposed development, <i>which means the final contribution will normally be 10% of the cost of the serviced land.</i>	To clarify the advice to applicants and to set out the processes including the worked example more clearly

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Para	Amendment	Reason
	<p>Replace the Summary of Overall Methodology and Worked Example with:</p> <p>Summary of Overall Methodology Through a Worked Example</p> <p>Assume that you are proposing to carry out a development of four units, with an anticipated sale price of £250,000 per unit.</p> <p>Step 1: Calculate the Open Market Value (OMV) of the development.</p> <p>The open market value is $4 \times £250K = £1m$</p> <p>Step 2: Find the residual land value of the development by applying the residual land value percentage (38.8%).</p> <p>$£1m \times 0.388 = £388,000$</p> <p>Step 3: Calculate 15% of the residual land value figure to establish the site preparation/servicing costs.</p> <p>$(£388,000 \times 0.15 = £58,200)$</p> <p>Add the 15% figure to the residual land value to include site preparation/servicing costs.</p> <p>$£388,000 + £58,200 = £446,200$</p> <p>Step 4: Apply the percentage contribution required under the affordable housing policy (normally 10%) to the resulting sum (i.e. step 3 total $\times 0.1$)</p> <p>$£446,200 \times 0.1 = A \text{ contribution of } £44,620 \text{ (or } £11,155 \text{ per unit)}$</p>	
6.11	<p>Replace the list of bullet points for how money will be used with:</p> <ul style="list-style-type: none"> • <i>Provision of new affordable housing in the District via a Registered Provider of social housing (including adding to provision on development sites, new stand alone schemes and existing property purchase)</i> • <i>Initiatives to make better use of the existing stock (including tackling under occupation and fuel poverty where it enables better use to be made of the stock)</i> • <i>Supporting the development of rural exception sites to meet rural housing needs (for fully or partially exempted Parishes only as set out in Section 17 Housing Act 1996, Housing (Right to Acquire or Enfranchise)(Designated Rural Areas in the South East) 1997 Order</i> 	To provide greater clarity of the Council's intentions on the use of off-site contributions

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Para	Amendment	Reason
	Then add new sentence: <i>Apart from the provision of rural housing funds will be used to meet affordable housing in a flexible way where it can be used most effectively across the District.</i>	
6.12	Amend to read: <i>Monitoring will be on a site-by-site basis. Funds collected will be used within ten years and after this time any unspent money will be refunded with interest.</i>	To improve clarity
6.13	Amend to read: "The Council will record where funds have been allocated and spent and . This information will be made available on request and will be published on an annual basis."	To confirm that information will be published
7.1	Amend fourth bullet point to read: <i>Enable early consideration of funding implications, including the likely price to be secured from the Registered Provider for the affordable housing</i> Amend last bullet point to read: <i>"Preferably agree the arrangements for the future ownership and management of the affordable housing with the RP..."</i>	To clarify the Council's approach
7.2	Add after first sentence: <i>"Where the RP has been selected, it is expected that developers will involve them in any pre application discussions"</i>	To clarify the Council's approach
App 2	Delete Orbit and Circle Anglia from the list of Preferred Development Partners	To bring the list up to date
App 4	Amend first sentence to read: Details of purchase price of the land <i>existing use value of the land</i>	Existing use value is the appropriate starting point for the appraisal
App 5	Definition of Intermediate Housing – Amend second sentence to read: "These can include shared equity products (e.g. Homebuy and shared ownership) and shared ownership products (e.g. Homebuy) other low cost homes for sale and intermediate rent but does not include affordable rented housing. Home ownership products delivered through the HCA and their local Zone Agent, and intermediate rented housing. It does not include low cost market housing." <i>"These can include shared equity products (e.g. Homebuy and shared ownership) and shared ownership products (e.g. Homebuy) other low cost homes for sale and intermediate rent but does not include affordable rented housing. Home ownership products delivered through the HCA and their local Zone Agent, and intermediate rented housing. It does not include low cost market housing."</i> Definition of Nomination Agreement – Amend second line to read:	To bring the definitions up to date

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Para	Amendment	Reason
	<p>“...the Council's ability to access accommodation for <i>Eligible Persons including</i> applicants of the Council's Housing Register”</p> <p>Definition of PPS3 – Add new sentence:</p> <p><i>“The definition of affordable housing in the PPS was updated in 2011.”</i></p> <p>Definition of Preferred Partners – Delete and replace with:</p> <p><i>“Registered Providers of social housing who are subject to regulation by the Tenant Services Authority. Appendix 2 to this document shows those RPs who are the preferred partners of the Council.”</i></p>	

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Sevenoaks District Council

Affordable Housing Supplementary Planning Document (SPD)

Consultation Statement

1. Introduction

The Affordable Housing Supplementary Planning document provides advice on how the Council’s Affordable Housing policy, as set out on the Core Strategy DPD, is to be implemented. This includes guidance on the range of approaches, standards and mechanism required to deliver a range of affordable housing to meet local needs.

Once adopted, the Affordable Housing SPD will form part of the Sevenoaks District Local Development Framework. It will not form part of the formal development plan for the area but will be a material consideration in the determination of planning applications. It will provide further guidance as to how national, regional and local planning policies will be applied in relation to the provision of Affordable Housing.

This document sets out Sevenoaks District Council’s approach to consultation and engagement in preparing the Affordable Housing SPD.

2. Approach to consultation

Regulation 17 of the Town and Country (Local Development) (England) Regulations 2004 (as amended 2008 and 2009) and sets out the minimum requirements for consultation and public participation on a Supplementary Planning Document (SPD).

Further to these minimum requirements, the adopted Sevenoaks Statement of Community Involvement (December 2005), ‘Planning for People’, sets out the range of approaches to consultation and participation that the Council will consider facilitating in preparing LDF documents. These are:

	How could you be involved?
Information	Local media (newspapers, radio, TV, local/Parish newsletters).
	Electronic resources (Internet, e-mail, online consultation, diary).
	Publicity in ‘community centres’ (e.g. local council offices, shopping centres, sports centres).
	Letter based consultation to persons and organisations listed on the LDF mailing list.

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Consultation	Documents available for inspection at local council offices.
	Area/Town Forums and Parish/Town Council Meetings.
	Qualitative Research (Focus Groups and Questionnaire Surveys).
	Public Exhibitions.
Participation	Preparation of locally based documents (e.g. Parish Plans and Village Design Statements).
	Participation Workshops
	Working Groups

Sevenoaks District Council considers that when preparing SPDs it is appropriate to inform, consult and seek the participation of organisations and/or individuals in order to ensure that the documents more closely reflect local needs and priorities.

Consultation and engagement with organisations and individuals in the process of preparing the Affordable Housing SPD.

Following preparation of a draft of the SPD, the Council resolved to undertake a 10 week formal consultation on the Affordable Housing SPD between 26th May 2011 and 4th August 2011.

As part of this consultation, the Council:

- Published the draft Affordable Housing SPD on the Sevenoaks District Council website;
- Made the draft SPD available for inspection at the Council's offices and libraries in the Council's administrative area during normal office hours;
- Sent letters to persons and organisations¹ on the Council's LDF mailing list inviting them to examine the consultation documents and make representation on them during the consultation period;
- Placed a public notice in local newspapers informing the public of the consultation matters, the consultation period and the places at which the documents could be inspected;
- Released the details of the consultation to the local press via a press release;
- Organised a briefing for local agents.

3. Organisation and individuals consulted

¹ Both 'specific' and 'general' consultation bodies as defined in Reg. 2 of the Town and Country (Local Development) (England) Regulations 2004 and amended 2009

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Sevenoaks District Council are required to consult those ‘specific’ and ‘general’ consultation bodies that the Council considers are affected by the SPD². A list of specific consultation bodies is set out in Reg. 2 of the Town and County Planning (Local Development) (England) Regulations 2004 (as amended 2009). The same regulation defines ‘general’ consultation bodies as any voluntary bodies, bodies representing racial, ethnic, national or religious groups or disabled persons and bodies representing the interests of businesses in the area.

The Council considered it appropriate to consult the following ‘specific’ consultation bodies on the draft Affordable Housing SPD:

- Homes and Communities Agency
- The Environment Agency
- English Heritage
- Natural England
- Neighbouring Authorities
 - Tonbridge and Malling Borough Council
 - Dartford Borough Council
 - Gravesham Borough Council
 - Tunbridge Wells District Council
 - Wealden District Council
 - Tandridge District Council
 - London Borough of Bromley
 - London Borough of Bexley
 - Hildenborough Parish Council
 - Shipbourne Parish Council
 - Ightham Parish Council
 - Wrotham Parish Council
 - Stansted Parish Council
 - Trottiscliffe Parish Council
 - Speldhurst Parish Council
 - Bidborough Parish Council
 - Southfleet Parish Council
 - Longfield and New Barn Parish Council
 - Darenth Parish Council
 - Sutton-at-Hone and Hawley Parish Council
 - Wilmington Parish Council
 - Meopham Parish Council
 - Forest Row Parish Council
 - Harfield Parish Council
 - Withyham Parish Council
 - Limpsfield Parish Council
 - Tatsfield Parish Council
 - Dormansland Parish Council
- Mobile Phone Operators
 - Mobile Operators Association

² As required by Reg. 17 (3) of the Town and Country Planning (Local Development) (England) Regulations 2004

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- Electricity and Gas Companies
 - N Power
 - EDF
 - E.On
 - Scottish and Southern Electricity
 - Utilita Services
 - Good Energy
 - Ecotricity
 - Ebico Ltd
 - Spark Energy
 - British Gas
- Sewerage Undertaker
 - Southern Water
- Water Undertakers
 - East Surrey Water Co.
 - South East Water
 - Thames Water
- Kent Police
- Kent County Council
- Parish Councils
 - Ash-cum-Ridley Parish Council
 - Brasted Parish Council
 - Chevening Parish Council
 - Chiddingstone Parish Council
 - Cowden Parish Council
 - Crockenhill Parish Council
 - Dunton Green Parish Council
 - Edenbridge Town Council
 - Eynsford Town Council
 - Farningham Parish Council
 - Fawkham Parish Council
 - Halstead Parish Council
 - Hartley Parish Council
 - Hever Parish Council
 - Hextable Parish Council
 - Horton Kirby & South Darenth
 - Kemsing Parish Council
 - Knockholt Parish Council
 - Leigh Parish Council
 - Otford Parish Council
 - Penshurst Parish Council
 - Riverhead Parish Council
 - Seal Parish Council
 - Sevenoaks Town Council
 - Sevenoaks Weald Parish Council
 - Shoreham Parish Council
 - Sundridge with Ide Hill Parish
 - Swanley Town Council
 - Westerham Parish Council

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- West Kingsdown Parish Council

In addition Companies, Organisations and Individuals on the Council's LDF mailing list were also invited to comment on the Affordable Housing SPD. This mailing list contains 350 consultees, being made up of all those who responded to previous formal and informal LDF consultations or who asked to be kept informed of the progress of LDF documents.

Drop in Sessions

4 Drop-in sessions were held for members of the public to discuss the draft SPD with members of the Planning Policy team.

Town and Parish Council Briefings

2 briefing sessions were held on the 13th and 16th June 2011.

Agents Forum

The following individuals and organisations were invited to an 'agents forum' on the 13th June to discuss the SPD.

- A W Hayward & Partners
- Alan E Falconer
- Albany Building Design
- Anderson North Partnership
- Andrew Boakes Associates
- Andrew Fryatt Associates Ltd
- Architectural Projects
- Barrett Haskins Designs Ltd
- Broadlands
- Browitt & Smith
- Burns Guthrie & Partners
- CASA Design Services Ltd
- Christopher Rayner Architects
- Chesterton Surveyors
- Cobden (Land & Property) Ltd
- Colin W Luther
- Crofton Design Services Ltd
- Cyma Architects
- David Brookes And Associates
- DHA Planning
- Direct Build Services Ltd
- Direct Planning Limited
- Down To Earth Design
- Down To Earth Tree Contracts Ltd
- Edwin Broome

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- Fry Drew Knight Creamer
- Gary Gabriel Associates
- Gina Hughes Tree Surgery
- Glyn Doughty
- Graham Simpkin Planning
- Grayston Alan & Durtnell
- Harlequin Ltd
- Harringtons 2006
- I K Wyatt Building Design Ltd
- Ibbett Mosely
- In Touch Home Improvement Agency
- Judith Norris Limited
- Keith Fox
- Kember Loudon Williams
- Madgwick & Dottridge
- Martin Bush Chartered Architect
- Mervyn Earl
- Mr Andrew Hudson
- Mr Brian Holliday
- Mr F J Tuson
- Mr Graham J Peachey
- Mr M Brown (Architect)
- Mr P Smith
- Mr Patrick Coakley
- Mr R Churchman
- Mr R F Newman
- Mrs H Gilmour
- P F Newton
- Paul Fowler
- PDI Partnership
- Peter Bodman Design Services
- Peter Evans
- Peter Kerr
- Phillip Hobbs
- Planning Potential
- Priory Designs
- Rayner Associates
- Richard Reid Partnership
- Robinson Escott Planning
- Sheffords Chartered Surveyors
- South East Surveys
- Stephen Langer Associates
- Stewart Elcomb
- The Barton Willmore Planning Partnership - Eastern
- The Downes Planning Partnership
- The Hards Partnership

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- The Surveyors Partnership
- Tree Craft Ltd
- Vanns & Jones Surveyors
- Vic Checksfield
- Woodward Ambrose Architects Ltd
- Wyatt Glass Architects

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LDF ADVISORY GROUP 7 SEPTEMBER 2011

THE NATIONAL PLANNING POLICY FRAMEWORK

Report of the: Director of Community and Planning

Status: For consideration

Executive Summary: This report summarizes and recommends a draft response to the consultation on the Government's National Planning Policy Framework which is intended to replace existing national planning policy in Planning Policy Guidance Notes and Planning Policy Statements. The draft response is in Appendix A to this report.

Portfolio Holder Cllr. Mrs Davison

Head of Service Head of Development Services – Jim Kehoe

Recommendation: That the comments in the Appendix form the basis of the Council's response to the consultation to be agreed by the Portfolio Holder.

Background

- 1 One aspect of the Government's proposals to reform the planning system is to replace all the existing national planning policy statements and guidance (PPSs and PPGs) with a much shorter single statement of Government planning policy. This is the National Planning Policy Framework (NPPF) which has now been published for consultation.
- 2 A copy has been placed in the Members Room and it is available via the following link: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1951747.pdf>
- 3 The Government is also committed to introducing a presumption in favour of sustainable development and that is included in the draft document.
- 4 District planning policies have to be consistent with national policies and national policy is also a key consideration in determining planning applications. The NPPF will therefore be of fundamental importance to future planning in the District.
- 5 The NPPF runs to 52 pages (excluding a Ministerial Foreword and Glossary) and is structured as follows:
 - Introduction. Outlines the scope and purpose of the guidance
 - Delivering Sustainable Development. Includes a definition of sustainable development and the presumption in favour.

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- Plan Making. This includes guidance on the preparation and content of development plans.
 - Development Management. Sets out the approach to dealing with development proposals.
 - Planning for Prosperity. Contains policy on business and economic development, transport, communications and minerals.
 - Planning for People. Contains policy on housing, design, sustainable communities and green belt.
 - Planning for Places. Contains policy on climate change, flooding and coastal change, natural environment and historic environment.
- 6 The document contains a mixture of new policy and shortened versions of existing policy. The appendix to this report contains a summary of the document, focussing on areas of change from existing policy, and also contains Officer comments which are intended to form the basis for our response to the consultation.
- 7 The consultation does not close until October 17 and before then the Government is holding a series of briefing sessions to which local authorities have been invited. We will be represented at the session on September 28 and it is possible that we may want to make detailed changes to the draft response as a result of discussion at this session and also further detailed scrutiny of the document. The recommendation allows for the Portfolio holder to agree the final response.

Options (and Reasons for the Recommendation)

- 8 The options are to agree the response, make changes or not to respond. The NPPF will be a key consideration in the future planning of the District and failure to respond would mean that the Council would miss out on the chance to influence its content. The draft response in the appendix is recommended for reasons set out in the report.

Key Implications

Financial

- 9 No implications from responding to the consultation. However, the contents of the NPPF may have a future impact on LDF expenditure if changes are required to existing policy.

Legal, Human Rights etc.

- 10 Government planning policy is recognised as an important consideration in determining planning applications. Development Plans that do not comply with Government policy are likely to be found unsound.

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Sources of Information: **National Planning Policy Framework Consultation draft**
Draft Planning Policy Statement on Planning for Traveller Sites and Council's response.

Contact Officer(s): Alan Dyer x7440

Kristen Paterson
Director of Community and Planning Services

Draft National Planning Policy Framework: Summary and Comments

The draft NPPF was published for consultation on 25 July and the consultation period runs until 17 October. It is intended to replace all existing Government planning policy guidance in PPGs and PPSs.

This note summarises the document, highlighting the main changes from existing policy, and identifies potential issues on which it is recommended that we comment. There is substantial repetition in the document (for example the phrase “presumption in favour of sustainable development” appears 19 times) and these notes try to avoid this by covering points where they are set out most fully.

Descriptions of the document content are in normal text and Officer comments are in *italic text*

Introduction (paras 1-8)

This section refers to the main themes of the document. Para 5 states that the NPPF sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Paras 6 and 7 exclude nationally significant infrastructure projects which are covered in separate national policy statements that will remain, and waste planning which is to be covered in a separate policy statement that will sit alongside the Government’s proposed National Waste Management Plan for England. Local authority waste plans should have regard to the NPPF.

Comments

In principle the simplification of national planning policy guidance and its consolidation into one document is to be welcomed.

Delivering Sustainable Development (paras 9-19)

Para 9 states that the purpose of the planning system is to contribute to achieving sustainable development. Para 10 identifies three components of sustainable development:

- Planning for Prosperity (an economic role)
- Planning for People (a social role)
- Planning for Places (an environmental role)

Para 11 refers to the three components being pursued in an integrated way and para 12 equates sustainable development with the contents of the NPPF (i.e. if development is consistent with the NPPF it’s sustainable).

Para 13 states that the Government is committed to ensuring the planning system does everything it can to support sustainable economic growth and that planning should encourage growth not act as an impediment. Significant weight should be placed on the need to support economic growth through the planning system. Para 14 describes the presumption in favour of sustainable development as “a golden thread” running through planning. It continues:

“Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible. Local planning authorities should:

- prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes
- approve development proposals that accord with statutory plans without delay; and
- grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.

All of these policies should apply unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

Para 15 states that all plans be based on and should contain the presumption in favour of sustainable development as their starting point

Para 19 contains a set of core planning principles which begin with the planning system being plan-led. It also includes the phrase that the default answer to development proposals should be yes except where this would compromise key sustainable development principles in the NPPF. The remaining core principles largely summarise existing policy.

Comments

The NPPF places great weight on the presumption in favour of sustainable development, which it equates with the content of the NPPF. The focus in considering planning applications will be whether the sustainability test is met yet in many cases this will not be clear as the NPPF is written in terms that support development unless there are overriding objections. In these cases the decision on whether the development is “sustainable” will require a judgement weighing up a range of issues rather than clearly point the way to a specific decision. It seems inevitable that more appeals will result revolving around whether the test is met. Some greater clarity could be achieved if para 14 stated more positively that decisions should be made in accordance with local plans, which would give more certainty of outcome and confirm the role of local plans in determining what development will be sustainable in their area.

Although para 19 states that the system is plan-led, in practice it may be less so for developments that do not accord with the plan, particularly where the presumption in favour extends to situations where the plan is silent or indeterminate. The Government’s approach logically suggests that the

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presumption should apply to developments on which there are no relevant policies in the plan but extending this approach to indeterminacy could lead to avoidable debate over the weight to be given to plan policies that necessarily use criteria to assess development and it is suggested that the wording should be amended to replace “silent or indeterminate” with “no relevant policies”.

Para 14 refers to meeting objectively assessed development needs unless the impacts outweigh the benefits. In Sevenoaks impacts could include potential loss of Green Belt and the weight to be attached to the Green Belt in the NPPF is considered is considered under comments on paras 133-147 below.

Plan Making (paras 20-52)

Para 20 states that local plans should aim to achieve sustainable development, meet objectively assessed needs unless adverse impacts would significantly and demonstrably outweigh benefits.

Para 21 maintains the requirement to produce a District-wide plan and highlights the ability to review local plans in whole or part. Other DPDs and SPDs can be produced where justified. SPDs should not add to the burden on development.

Paras 23 and 24 include requirements for local plans most of which are unchanged. There is support for allocating sites to promote development and also for identifying areas where it may be necessary to limit the freedom to change use of buildings.

Para 26 defines an up to date plan as one that is consistent with the NPPF. Absence of up to date plan means decisions should be based on NPPF. Local authorities can seek a certificate of conformity for existing plans.

Paras 27-38 deal with a range of substantive issues under the heading “Using a proportionate evidence base”. These include housing, business infrastructure and minerals requirements, environmental assessment, historic environment and health and well-being. Para 28 on housing maintains the requirements for SHMAs and SHLAAs. SHMAs should address needs but cater for demand.

Paras 39-41 on ensuring viability and deliverability stress that obligations and policy burdens should not threaten viability. This should include facilitating development throughout the economic cycle (para 41). Para 40 refers to the role of the Community Infrastructure Levy (CIL), including the proposal that a meaningful proportion of funds raised should be placed under the control of neighbourhoods where development occurs.

Paras 44-47 cover planning strategically across local authority boundaries, including the duty to cooperate. Para 45 requires authorities to work collaboratively on strategic planning priorities to enable delivery of sustainable economic growth in consultation with Local Enterprise Partnerships. Para 46

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requires evidence of cooperation on issues with cross-boundary impacts and para 47 states that joint working should enable lpas to meet requirements that can't be met within their own areas.

Para 48 introduces a new soundness test for examinations – whether a plan is positively prepared, meaning that it should be based on a strategy which seeks to meet objectively-assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistent with the presumption in favour of sustainable development. The effectiveness test is amended to include effective joint working on cross boundary strategic priorities.

Paras 49-52 cover Neighbourhood Plans including the requirement for conformity with the strategic policies of the local plan. Para 50 states that Neighbourhood Plans can promote more development than local plans. Para 51 states that, subject to compliance with strategic elements of the local plan, Neighbourhood Plans take precedence over local plans and local plans should avoid duplicating Neighbourhood Plans.

Comments

The wording in para 21 which allows for other DPDs, in addition to the Core Strategy, to be prepared where justified is supported and should cater for situations like ours where we have followed previous guidance in concentrating on key issues for the Core Strategy and reserving matters of detail for other documents.

The text on SPDs (also in para 21) should be amended to incorporate the established principle that they should not be used to introduce or amend policies that should be included in a development plan, wording that is necessary because SPDs are not subject to the statutory procedures, including independent examination, that apply to development plans. This would provide a context for the statement that SPDs should not add to the 'financial burdens' on development. We use SPDs to provide guidance on the implementation of Core Strategy policy, including policy on developer contributions and affordable housing, but the "financial burden" is established through the Core Strategy not the SPD.

The certificate of conformity for existing plans (para 26) is an unprecedented centralising measure that, if applied rigidly, risks undermining the plan led system the NPPF claims to support by rendering existing plans out of date and of little value as a basis for decision making. Para 26 could be read as rendering every existing plan out of date in that the NPPF contains changes from current national policy that cannot be fully reflected in plans adopted before its publication. To support the plan led system, as the NPPF professes to do, and ensure a smooth transition to the new system the NPPF needs to incorporate positive recognition of the value of existing plans, particularly core strategies that have recently been found sound. It should not be drafted in a way that undermines recently-adopted plans.

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Unfortunately the NPPF gives no guidance on how applications for certificates will be considered. The Government should take a practical approach that is supportive of Councils that have got on with producing and adopting plans and it should recognise that plans produced before the NPPF was published cannot be expected to comply word for word with the new document.

Paras 44-47 respond to the duty to cooperate in the Localism Bill and criticisms that have been made about the lack of strategic planning above District-level, yet the way this section as written is vague in terms of what Districts are expected to do and what the outcomes should be. Greater clarity is needed particularly given that compliance is to be part of a soundness test in examinations.

Para 51 on the relationship between neighbourhood plans and local plans needs to recognise that neighbourhood plans are voluntary and many communities will not choose to prepare them. In Sevenoaks there is currently limited support from parishes wishing to prepare neighbourhood plans. The NPPF should acknowledge that local plans prepared by District Councils will still have a role in setting out detailed policies and site allocations and that there is a potential role for non-statutory parish plans to be adopted as SPDs provided they are consistent with District-wide plans.

Development Management (paras 53-70)

Paras 53-55 require a positive approach to development, incorporating the Government's existing statement requiring significant weight to be attached to the benefits of economic and housing growth.

Paras 56-61 promote pre application discussions as a means to securing better outcomes. Local authorities are asked to encourage such discussions and statutory consultees are also urged to participate. Para 60 states that planning performance agreements should be considered where they will achieve faster and more effective outcomes.

Para 62 states that Local Plans are the starting point for determining applications but para 63 says lpas should apply the presumption in favour of sustainable development in considering proposals.

Para 64 promotes Local Development Orders, which permit specified types of development in defined locations, and limits use of Article 4 directions to where it is necessary to protect local amenity or well being of an area, referring as an example to demolition of local facilities. Paras 65 incorporate references to Neighbourhood Development Orders and Community Right to Build consistent with previous Government statements on these measures which form part of the Localism Bill.

Paras 67-70 cover conditions and obligations in a way that is consistent with current guidance. Para 70 states that local planning authorities should avoid

unnecessary conditions or obligations, particularly when the viability of development proposals would be undermined.

Comments

Paras 62 and 63 when read together give reduced weight to development plans as they now sit alongside the general presumption in favour of development. Given that the Government wishes to see the presumption in favour of sustainable development incorporated into development plans these paragraphs could better be expressed as a presumption in favour of the development plan with the separate presumption in favour of sustainable development coming in to play when there is no relevant development plan policy.

There is no reference in this section to the status in decision making of emerging development plans, which is currently contained in the supplement to PPS1 and would be lost if it is not included in the NPPF. This guidance is valuable and would be helpful to local authorities bringing forward new or amended plans consistent with the NPPF. It also helpfully clarifies the status of emerging plans for the benefits of users of the system.

Paras 67-70 should make reference to the Community Infrastructure Levy and its interaction with planning obligations.

Planning for Prosperity: Business and Economic development (paras 71-81)

Para 72 lists objectives relating to business, town centres and the rural economy.

Paras 73-75 cover supporting economic development largely consistent with existing policy. Para 73 includes lack of housing as a barrier to investment and para 75 states that plans should avoid long term protection of employment land, adding that applications for alternative uses should be treated on their merits having regard to market signals and relative need for different land uses.

Para 76-80 cover town centres. The sequential approach giving preference to town centre locations is maintained for retail and leisure uses but not for offices. Para 78 introduces a reference to viability in applying the sequential test. Para 80 includes the impact test for out of centre retailing but there is no needs test.

Para 81 requires a positive approach to development in rural areas to support the local economy

Comments

The reference in para 75 to long term protection of employment land needs some qualification. The paragraph states that need for different land uses should be taken into account in considering alternative uses which would suggest that sites can be protected where they are needed and a qualification

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to state that sites should only be protected where there is evidence that they are needed should be sought. Without such qualification the District's ability to maintain a stock of employment land to meet future needs will be threatened.

There are several comments on the town centre section:

- It does not re-introduce the needs test as promised in the Government's pre-election green paper "Open Source Planning". This test would assist in maintaining town centre viability and an amendment to introduce it is recommended.*
- The weight to be given to the sequential test in decision-making on planning applications should be clarified particularly the existence of a sequentially preferable site. The text as drafted could be read as giving this very little weight. Existing policy in PPS4 (Policy EC17.1) allows for permission to be refused where the sequential test is not met and the development is contrary to an up to date development plan. The retention of this wording is supported but if that is not acceptable to the Government wording should be added to the effect that development would not be regarded as sustainable if it fails the sequential test.*
- The requirement in PPS4 (Policy EC15.1) that developers and operators should demonstrate flexibility in terms of scale, format, parking and disaggregation in making sequential assessments is important in promoting the growth of town centres. This approach needs to be retained in the NPPF and is essential to ensure a balanced consideration of whether town centre and edge of centre sites are suitable as an alternative to out of centre.*
- Commentators have expressed concern at the removal of offices from the town centre policy. In practice this is less important for us because we are not a centre for major office development but offices logically fit in to the town centre first approach given that they are major traffic generators and employees can contribute substantially to the town centre economy. It is considered that offices should be retained in the town centres policy as in PPS4.*

Planning for Prosperity: Transport (paras 82-94)

Para 82 states that the transport system should be balanced in favour of sustainable modes but adds that solutions will vary between urban and rural areas. Para 83 supports a pattern of development that, where reasonable to do so, facilitates use of sustainable modes of transport and para 88 requires development that generates significant movement to be located where the need to travel will be minimised and the use of sustainable modes maximised.

Para 84 states that transport policy should also facilitate economic growth and para 85 states that strategies should be produced to provide transport infrastructure to support economic growth. This includes a reference to roadside facilities for motorists.

Para 86 retains requirements for transport assessments set by local criteria.

Paras 88-94 cover reducing emissions and congestion and largely reflect existing guidance. Para 89 requires facilities for electric vehicle charging and para 90 supports Travel Plans

Para 93 lists factors to be taken into account in setting standards for new development but no specific standards are set, which means there will no longer be national parking standards.

Comments

This section largely reflects existing guidance with the deletion of maximum parking standards, which we may wish to support. No specific concerns.

Planning for Prosperity: Communications Infrastructure (paras 95-99)

This section broadly reflects existing guidance, including consideration of telecommunications masts.

Comments

No comments on this section.

Planning for Prosperity: Minerals (paras 100-106)

This section broadly reflects existing guidance. (Note: subject to further scrutiny)

Comments

No comments on this section.

Planning for People: Housing (paras 107-113)

Para 107 states that the key objective is to increase housing supply and adds that everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live.

Para 109 identifies measures to increase the supply of housing. It states that the Local Plan should meet the full requirement for market and affordable homes in the area. It requires a five year supply of deliverable sites plus 20% to ensure choice and competition. The definition of deliverability is amended through a footnote stating that in particular development of the site should be viable. The definition of developable for sites after year 5 is also changed to include a reference to viability. Guidance on windfall sites is unchanged.

Para 110 repeats earlier guidance requiring objectively assessed needs to be met unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits and also applying the presumption in

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favour of sustainable development. It adds that permission should be granted where a local authority cannot demonstrate an up to date five year supply.

Para 111 covers housing size and type, including affordable housing. This section is short and deletes reference to the national threshold of 15 units for affordable housing provision. It retains reference to mixed and balanced communities and a preference for onsite over offsite provision.

Para 112 on rural housing states that local authorities should consider allowing market housing to facilitate affordable in rural areas. (Note: this wording does not appear in the reference to affordable housing in Green Belt areas – see below)

Para 113 includes an exception to policy for exceptional or innovative housing in rural areas (again not repeated in the Green Belt section)

Comments

Introducing a 5 year supply plus 20% requirement will mean that Districts may have to release more land for housing than is required to meet the provision in their plan. For Sevenoaks meeting this requirement should not pose a problem in the next few years because of the front loading of our housing supply, particularly the contribution of West Kent Cold Store. In the longer term the supply position may become tighter, particularly if the supply of smaller sites is not maintained. The change will increase the likelihood that Reserve Land will be needed later in the plan period.

A further potential issue with the five year supply is the reference to viability. An assessment of the viability of every site in the five year supply would be particularly onerous for Districts that have a large number of small sites, and may impact upon our LDS timetable. Using developer intentions as a proxy is a practical approach supported at the Core Strategy examination and could be integrated into the guidance.

The section on affordable housing is very thin and does not even reference affordable housing in the sub-heading, which may be indicative of its relative priority. PPS3 contains a statement that the Government is committed to providing high quality housing for people who are unable to access or afford market housing and it is considered that this policy objective should be retained. At minimum there also needs to be explicit support for the principle of requiring developers to incorporate affordable housing where there is a need, allowing for refusal where there is no provision.

The approach to rural exception sites encouraging incorporation of market housing is a departure from current guidance which sees rural exception sites as for affordable housing only. There is no longer any reference to rural exception sites being reserved for affordable housing in perpetuity or for local people. These are important aspects of ensuring success and gaining acceptance of the policy and need to be retained.

Gypsies and Travellers (not included in the NPPF)

The Planning for People section of the NPPF contains no mention of gypsies and travellers. Earlier in the summer the Government consulted on a draft Planning Policy Statement on Planning for Traveller Sites and on 9 August an email was received from Communities and Local Government inviting comments on a proposal to incorporate traveller sites policy into the NPPF and on the consistency of the two documents.

Comments

The principle of including policies on Gypsies, Traveller and Travelling Showpeople in the National Planning Policy Framework is supported. To do otherwise would undermine the aim of setting out all national planning policy in one document. However, the Council does not support incorporating Planning for Traveller Sites, as currently drafted, into the NPPF. Our representations dated 6 July sought a number of changes to the consultation document. Key points are set out in the supplement at the end of this response which also includes comments on consistency between the two documents.

Planning for People: Design (paras 114-123)

This section is largely based on existing policy. It includes the Government's objectives and policies to deliver high quality design. Para 117 recommends using design codes and overarching design policies to encourage good, locally sensitive design. Para 122 states proposals that can demonstrate good engagement with the community in developing the design of the new development should be looked on more favourably. Para 123 contains current guidance on outdoor advertisements.

Comments

The support for design codes is welcome and is consistent with the Residential Character Assessments programmed for the District's main towns and village design statements.

The promotion of engagement with the community is supported but it should be seen as a means towards achieving better quality development, not a reason in itself for permitting development, which the draft NPPF appears to suggest.

Planning for People: Sustainable Communities (paras 124-132)

Para 124 states that the planning system should:

- create a built environment that facilitates social interaction and inclusive communities

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- deliver the right community facilities, schools, hospitals and services to meet local needs; and
- ensure access to open spaces and recreational facilities that promote the health and well-being of the community.

Para 126 includes safeguarding against the unnecessary loss of community facilities, particularly those meeting day-to-day needs. It also requires investment to improve sustainability where housing is proposed in less sustainable locations.

Para 127 states that authorities should attach very significant weight to the desirability of establishing new schools. It allows for permission to be refused if these benefits are outweighed by adverse impacts on the local area. (Note there is no specific reference to change of use of buildings to schools which the Government had previously been proposing to remove from planning control).

Para 128 summarizes existing policy on identifying open space, sport and recreation needs. Para 129 states that these sites and premises (including playing fields) should not be built on unless they are assessed to be surplus to requirements or the need for and benefits of the development clearly outweighs the loss.

Para 130 introduces the new 'Local Green Space' designation which would have similar protection to Green Belts. These can only be identified through a development plan. Criteria for designation are contained in para 131 and include the space being reasonably close to a centre of population, being demonstrably special to the local community and holding a particular local significance and not being an extensive tract of land. It is stated that the designation will not be appropriate for most open spaces.

Comments

The section on community facilities is supported.

The introduction of the 'Local Green Space' designation looks like creating two categories of open space given that the NPPF envisages that the new designation would not apply to most open spaces. This may raise issues over identifying criteria for which open spaces comply with the new designation. However, the strong protection afforded to Local Green Space is to be supported and the principle of the designation is likely to be strongly support by local communities.

Para 129 on the loss of open space should include a requirement for replacement provision of equal value where open space is lost on the grounds of benefits from the development.

Planning for People: Green Belt (paras 133-147)

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The guidance on the definition and review of Green Belts and much of the policy on definition of appropriate and inappropriate development remains, together with the presumption against inappropriate development (Para 142). Crucially para 137 retains the wording that Green Belt boundaries should only be altered in exceptional circumstances.

Para 139 on considering the consequences for sustainable development when Green Belt boundaries are reviewed is also unchanged, but it needs to be seen in the context of the Government's new definition of sustainable development, with its greater emphasis on providing for development. Para 140 states that when defining Green Belt boundaries, LPAs should ensure consistency with Local Plan strategy for meeting identified requirements for sustainable development.

Para 144 introduces some changes to the definition of appropriate development. The test for facilities for outdoor sport and recreation is changed from essential to appropriate. Extension, alteration or replacement of a dwelling becomes the extension, alteration or replacement of a building. MDS policy is replaced with reference to the infilling or redevelopment of previously developed sites.

Para 145 adds local transport infrastructure and Community Right to Build to the list of developments that are not inappropriate provided they preserve openness. The guidance on re-use of buildings is also greatly simplified limiting the test to whether the buildings are permanent and substantial and that the re-use preserves openness and does not conflict with Green belt purposes.

Comments

Reading the Green Belt section in isolation would suggest there is no significant change subject to comments below on appropriate development. But this will only be the case in Green Belt Districts if the policy is seen as sufficient to override the requirement to meet development needs. The wording in para 140 that when defining Green Belt boundaries authorities should ensure consistency with meeting identified requirements for sustainable development might be read as requiring Green Belt release to meet development needs. However, the paragraph refers to defining rather than reviewing Green Belt boundaries and this interpretation appears inconsistent with the retention of wording about the permanence of Green Belt and boundary changes only in exceptional circumstances. Statements from ministers have also stressed that Green Belt policy is not being changed. Green Belt policy involves restraint on development and means that development needs are not all likely to be met in Green Belt areas. Some clarification to this effect within the final document would overcome potential inconsistencies that exist in the draft

The change to para 144 to allow replacement of buildings regardless of their use enables appropriate development (farm buildings) to be replaced by inappropriate development (houses and commercial buildings) effectively

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urbanising the Green Belt. It is an approach that could lead to a proliferation of scattered residential and commercial development in potentially isolated rural areas contrary to principles of sustainable development to a much greater degree than current policy which allows re-use but not replacement. The paragraph should be qualified to only apply to existing inappropriate development.

The change from essential to appropriate facilities for outdoor sport and recreation, also in para 144 is not supported. The essential facilities test is well established and understood and should be retained as should the helpful examples of essential facilities in PPG2.

The treatment of all previously developed sites on the same basis could also have adverse consequences raising hopes of infilling on small sites which would be incompatible with Green Belt status, whilst removing the special position of MDSs. The text should be amended to allow for Districts continuing to designate and produce local policies for major developed sites.

Planning for Places: Climate Change, Flooding and Coastal Change (paras 148-162)

Para 148 states that planning should fully support the transition to a low carbon economy in a changing climate. Para 149 adds that planning authorities should adopt proactive strategies to mitigate and adapt to climate change.

Para 150 states that requirements for building sustainability should be consistent with Government's zero carbon building policy (yet to be finalised).

Para 152 gives support to development proposals for renewables and low carbon energy. Para 153 refers to mapping of opportunity areas in plans and requires proposals outside mapped areas to meet the local criteria on which opportunity areas are based.

Para 155 retains the requirement for strategic flood risk assessments and para 156 retains the sequential and exceptions tests for locating development in areas liable to flood. Para 157 retains guidance on the use of flood risk assessments in dealing with planning applications. The classification of development by vulnerability to flooding does not appear except in a brief reference in a footnote.

Paras 159-162 deal with coastal change.

Comments

KCC is currently leading on the mapping of opportunity areas for renewables. It is unclear whether the NPPF is expecting such mapping to be in development plans. It would be helpful if the NPPF could clarify the intended

status of such maps though we are not expecting substantial areas to be identified in Sevenoaks.

The references to SFRA and FRAs contain no practical guidance on their content (they are not even listed in the Glossary). Some further guidance will be needed to avoid future disputes. The NPPF also needs to cover vulnerabilities of different types of development to flooding reflecting current guidance in PPS25.

Planning for Places: Natural Environment (paras 163-175)

Para 165, which repeats the overall approach of the NPPF to development, states that plans should aim to minimise adverse effects on the local and natural environment and that plans should allocate land with the least environmental or amenity value where practical, having regard to other policies.

Para 166 requires criteria based policies for the protection of landscape and wildlife sites.

Para 167 requires authorities to plan positively for green infrastructure and biodiversity networks. It also gives preference to development of lower grade agricultural land. It maintains the approach to major development in AONBs.

Para 168 covers planning for biodiversity reflecting existing guidance. It includes reference to indicators for monitoring. Para 169 states that permission for development should be refused if significant harm to biodiversity cannot be avoided. Proposals resulting in the loss or deterioration of irreplaceable habitats should be refused unless outweighed by the need for and benefits of the development. It also encourages biodiversity in and around developments.

Paras 171-175 cover noise and pollution and represent a greatly shortened version of existing guidance. Noise is covered in para 173 but there is no longer any reference to Noise Exposure Categories. Para 173 also includes a reference to identifying and protecting areas of tranquility. Para 174 makes cross reference to Air Quality Action Plans. Para 175 seeks to limit light pollution.

Comments

The text on the natural environment generally maintains existing policy and is consistent with the approach in our Core Strategy and the emerging Allocations and Development Management policies. No objection is raised.

Noise and air pollution are dealt with quite briefly and rather lost at the end of the Natural Environment section. The structure of the NPPF would benefit from making this a separate sub section in Planning for Places.

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Noise Exposure Categories should be retained as they provide an objective basis for assessing impacts/acceptability.

Planning for Places: Historic Environment (paras 176-191)

This section is largely based on existing guidance

Para 178 states that authorities should set out a strategy for the historic environment including heritage assets most at risk. It also refers to the desirability of new development making a positive contribution to local distinctiveness.

Para 180 puts the onus on the developer to describe significance of heritage assets affected while para 181 states that the planning authority should assess significance of assets affected.

Para 183 deals with harm to heritage assets. It states that as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional while substantial harm to or loss of designated heritage assets of the highest significance, including scheduled monuments, grade I and II* listed buildings and grade I and II* registered parks and gardens, should be wholly exceptional. Para 184 contains more detailed criteria. Para 185 requires a balanced judgement where the heritage asset affected is not designated including a reference to the presumption in favour of sustainable development.

Para 187 states that loss of a non designated building that makes a positive contribution to a Conservation Area should be treated as substantial harm to a designated heritage asset.

Para 188 suggests authorities should treat favourably developments that better reveal the significance of heritage assets.

Comments

Existing policy in PPS5 includes a presumption in favour of the conservation of designated heritage assets, stating that the more significant the heritage asset the greater the presumption. This is followed by the specific guidance that is retained in para 183 of the NPPF. The presumption is an important part of the policy and gives it added weight, especially when otherwise it is set against the new presumption in favour of sustainable development. The existing wording should be retained.

PPS5 also has a policy on the setting of a designated heritage asset. While some aspects of this have been retained in the NPPF the specific recognition that adverse impact on the setting of a heritage asset should weigh against a proposal is not clearly set out and should also be retained.

Finally PPS5 contains a detailed policy setting out the factors that should be taken into account in assessing proposals for enabling development intended to secure the future conservation of a heritage asset. The NPPF in para 190 reduces enabling development to a single sentence assessing whether the benefits outweigh the disbenefits where a departure from policy is involved. The more detailed guidance in PPS5 is important and should not be lost.

Supplement

Additional National Planning Policy Framework Consultation on incorporating Planning for Traveller Sites

The Government is proposing to incorporate 'Planning for Traveller Sites' into the National Planning Policy Framework. As part of the consultation on the NPPF, it is asking for responses to the following question:

Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

Sevenoaks District Council supports the principle of including policies on Gypsies, Traveller and Travelling Showpeople in the National Planning Policy Framework. To do otherwise would undermine the aim of setting out all national planning policy in one document. However, the Council does not support incorporating Planning for Traveller Sites, as currently drafted, into the NPPF. SDC's objections to Planning for Traveller Sites are set out in its representations of 6th July 2011.

The Council considers that a key objective of national policy should be to share responsibilities for provision more equitably amongst local authorities and communities. The policies currently set out in 'Planning for Traveller Sites' would result in gypsies and travellers increasingly being concentrated into those districts with high levels of existing provision. The Council has expressed its concerns that the suggestion that local planning authorities voluntarily co-operate to address needs where there are significant constraints is unrealistic and flawed.

In addition to this, Sevenoaks District Council does not support the proposal that local authorities should be required to identify and maintain a 5 year supply of deliverable gypsy and traveller pitches to meet identified need. The Council argues that to expect gypsy and traveller families to identify sites that could meet their needs over this period is unrealistic and that rigorous application of this policy is likely to lead to unsound LDF documents.

The need for a 5 year supply of deliverable sites is based on a general approach that seeks to align Gypsy and Traveller policy much more closely

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with general housing policy (Planning for Traveller Sites, para 3.4). Whilst this is an appropriate aim in some respects, including for policies on Green Belt protection, it is not an approach that should be applied to all policy issues. Currently there are policies in 'Planning for Traveller Sites' that are, quite correctly, not consistent with the policies in the housing chapter of the NPPF.

Whilst the NPPF states that planning permission for housing should be granted where a local authority can not currently demonstrate a 5 year supply of housing (para 110), 'Planning for Traveller Sites' states that where a 5 year supply can not be identified, *temporary permissions* should be *favourably considered* (para 26). Notwithstanding the Council's concerns about planning for a 5 year supply of Gypsy and Traveller Sites, the proposal that temporary permissions for pitches should be favourably considered is a more appropriate approach than would be the case if the policy was to be made consistent with NPPF para 110. The use of temporary permissions, where acceptable, will ensure that local authorities retain the ability to determine acceptable locations for gypsy and traveller pitches over the longer-term through LDFs.

In addition, Sevenoaks District Council would not support an amendment to 'Planning for Traveller Sites' that would require local authorities to identify sufficient sites to meet needs plus at least 20%. Whilst this move would ensure consistency with the housing policies of the NPPF, it would not be supported on the basis that identifying a 5 year supply already appears to be an unrealistic requirement in 'Planning for Traveller Sites'.

